United States
Department of
Agriculture
Forest
Service

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TRIPOLI EAST VEGETATION MANAGEMENT PROJECT

Towns of Livermore and Thornton
Grafton County, New Hampshire

Decision Notice, Finding Of No Significant Impact,

and

Appendix I – Forest Service Response to 30-Day Comments

For the

Environmental Assessment 2.0

Prepared By
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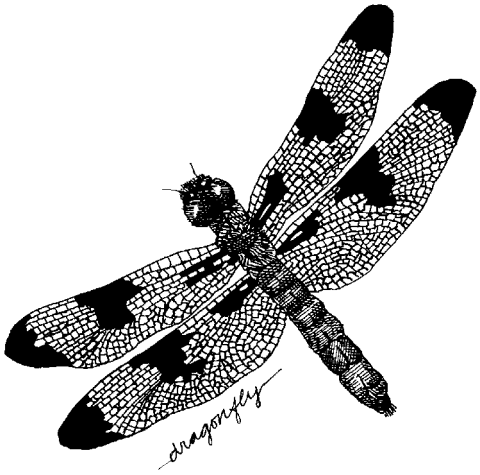

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TRIPOLI EAST VEGETATION MANAGEMENT PROJECT

DECISION NOTICE AND FINDING OF NO SIGNIFICANT IMPACT

For the

ENVIRONMENTAL ASSESSMENT 2.0

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1.0 BACKGROUND

Located near Tripoli Road and Waterville Valley, New Hampshire, the Tripoli East Vegetation Management Project includes 1,087 acres of activities in Compartments 112 - 117, HMUs 416 and 417, Ammonoosuc-Pemigewasset Ranger District, White Mountain National Forest (WMNF) (Maps, pp. 19 &20).

2.0 DECISION TO BE MADE

This Decision Notice documents my decision of which activities to implement within the Tripoli East Project Area to meet the identified purpose and need. Specifically, the decisions documented are:

- **Decision Point 1:** Which actions, if any, will be approved (which alternative to implement) that will move the Tripoli East project area towards the desired condition per Forest Plan direction and best addresses the needs and issues identified for this project?
- **Decision Point 2:** Does the proposed project have a significant impact that would trigger a need to prepare an Environmental Impact Statement?
- **Decision Point 3:** What mitigation measures and monitoring requirements should the Forest Service apply to these activities to meet Forest Plan standards and guidelines for all resources?
- **Decision Point 4:** Will a Forest Plan amendment be required to accommodate this project?

3.0 PURPOSE AND NEED FOR ACTION

3.1 Purpose of the Proposal

The purpose of this project is to implement Forest Plan direction (WMNF LRMP; USDA Forest Service, 1986, as amended; pages III-5 through III-41) in the Tripoli East project area by addressing site-specific needs and opportunities to move the area from the existing condition (EC) towards the desired condition (DC). The Tripoli Project is in Management Areas (MAs) 2.1 and 3.1 and Habitat Management Units (HMUs) 416 and 417. The primary purposes of these MAs and HMUs Can be found in the EA, Appendix C.

3.2 Need for Change

The need for change is determined by comparing desired conditions in the Forest Plan with the existing conditions in the project area. The Forest Plan provides desired conditions for even- and uneven-aged management systems for MA 2.1 and 3.1 lands and for HMUs by even- and uneven-aged management systems (EA 2.0, Appendix D – Habitat Management Units (HMUs) 416 and 417 Data). The even- and uneven-aged desired conditions apply to the "ideal" management area and are not prorated for each project area.

An interdisciplinary (ID) team (EA 2.0, p. 110) surveyed and evaluated the Tripoli East project area. The team identified site-specific opportunities for natural resource management that would change or enhance the existing conditions and move the area toward the desired condition described in the Forest Plan (pp. III-30 through III-41).

The following list describes the "needs for change" and opportunities identified for the Tripoli East project area that would meet the project's purpose of implementing the Forest Plan.

It should be noted that protecting riparian values, maintaining and protecting habitat for proposed, threatened, endangered, and sensitive species, and maintaining healthy and resilient watershed into the future have been and will continue to be primary considerations in management of the Tripoli East project area.

Item 2 was identified following scoping and is reflected in alternatives 3-6.

2. At the landscape level (MA 2.1 and 3.1 lands in HMUs 416 and 417) the composition of habitat communities is weighted towards mature and over-mature forests (EA, Appendix D), and there is little regenerating habitat (Table 1). Forest Plan direction for these MAs is to provide a balanced mix of habitats for all wildlife species and to increase wildlife habitat diversity for the full range of wildlife species with emphasis on early-successional species.

Table 1: Percent Regeneration and Mature/Over-Mature Community Type in HMUs 416 and 417

	Age Class	
	Regeneration	Mature/ Over-Mature
Total % of MA 2.1 & 3.1 Lands within HMU 416	2%	80%
Total % of MA 2.1 & 3.1 Lands within HMU 417	0%	66%

2. Based on Forest Plan desired compositions (pp. III-13, VII-B-4, & VII-B-5), there is a need for increased regenerating forest age class. In addition, opportunities exist, through timber harvesting and reforestation treatments, to improve the growth, vigor, and health of forested stands. These improvements can be accomplished by harvesting mature or poor quality trees and regenerating new trees (Forest Plan, pp. III-3, III-30, III-36), and, thus, to provide a variety of wildlife habitat types and conditions. Stands would be harvested in accordance with the appropriate silvicultural guidelines and Forest Plan direction. Appendix E summarizes stand conditions. Activities could include clearcutting and group selection, single-tree selection, and group and single-tree selection.

   The stands where even-aged silvicultural activities are proposed fall into two situations: The most common situation is stands that are dominated by paper birch trees. These trees are mature with many individuals becoming decadent or dying. The other situation is mature northern hardwood stands with established, desirable regeneration in the understory.

   In both cases, even-aged management techniques are the most appropriate method of achieving the habitat objectives of HMUs and producing high quality forest products efficiently. In addition, it is the best way to insure that paper birch and other shade-intolerant species remain as a viable part of the species diversity objectives. Within this even-aged concept, clearcutting the proposed stands at this time is the optimal method of achieving habitat objectives and regenerating trees for a future timber supply.

3. Dispersed camping along the Tripoli Road is very popular. This creates some problems with parked cars, and some of the existing dispersed sites are located on the lower terraces adjacent to Eastman Brook. When harvesting units are located adjacent to the Tripoli Road, an opportunity is created to locate off-road dispersed campsites that do not have an impact on Eastman Brook. There is a need to relocate dispersed camping sites along the Tripoli Road out of the lower terraces adjacent to Eastman Brook onto upland sites to prevent possible future erosion and sedimentation during periods of out of bank flow.

   Creating upland dispersed sites would provide an opportunity to eliminate and revegetate sites currently located on the lower terraces adjacent to Eastman Brook where erosion and sedimentation could be a concern (Forest Plan, pp. III-2, III-3, III-31, III-35), while continuing to accommodate existing camping.

4. There is a need to maintain an adequate transportation system for both short- and long-term access to facilitate the management of National Forest Lands and to provide motorized recreation opportunities (Forest Plan, III-31 and III-35).

   Congress annually funds the Forest Service to provide commercial timber within the capability of the lands and individual Forest Plans. The White Mountain National Forest

Plan allocates land for sustainable wood production (MAs 2.1 and 3.1, Forest Plan, III-30 and III-35). The Tripoli East Project Area has the potential to produce commercially valuable wood products that can be provided in line with congressional appropriations, while at the same time contributing to the economic vitality of local communities (Forest Plan, III-3, III-30, and III-35).

4.1 Public Involvement

Comments on the proposed action, potential concerns, and opportunities for management of the Tripoli East project area were solicited from Forest Service employees, members of the public, other public agencies, adjacent property owners, and organizations. A scoping letter was mailed to approximately 104 interested parties, including adjacent property owners, on 09/22/98.

Some concerns raised were not relevant to the project or were beyond the scope of this proposal and were not considered in the analysis. For a summary of the scoping process and the disposition of comments received during the scoping period, please see EA: §1.7.1 Scoping, pp. 5-6; §1.8 Issues Used To Formulate Alternatives, pp. 6-7; and Appendix B - Scoping. All public responses to the project scoping are located in the Tripoli East Vegetation Management project file located at the Pemigewasset Ranger Station.

Seven letters commenting on the proposed action were received during the formal Scoping process. Comments were used to define unresolved (significant) issues, to develop alternatives, and to analyze effects.

The original Tripoli East Project EA (version 1.0) was released for public comment on March 25, 2002. Comments were received from two individuals. These comments were considered in the preparation of this EA. The Tripoli East Vegetation Management Project decision (based on the Tripoli EA 1.0) was signed by District Ranger John Serfass on May 15, 2002. An appeal was filed with the Regional Forester on June 12, 2002 by a third individual who did not respond during the 30-day comment period.

The Regional Forester remanded that decision on July 26, 2002 because of inadequate cumulative effects analyses.

The purpose and need for the Tripoli East Vegetation Management Project has not changed. Therefore, no additional Scoping was conducted. The issues identified in the Tripoli EA 1.0 remain the same, and the alternatives to the proposed action remain the same. The Tripoli East EA 2.0 includes a re-analysis of possible direct, indirect, and cumulative effects of the proposed action and alternatives on the various resources found in the Tripoli project area. The comments received during the review period for the Tripoli East EA 1.0 and the comments contained in the Tripoli East Decision appeal were taken into account for the re-analysis of possible direct, indirect, and cumulative effects for this Tripoli East EA 2.0.

The Tripoli East EA 2.0 was released for review and comment on March 7, 2003. Comments were received from 7 individuals (see the accompanying Appendix I - Forest Service Response to 30-Day Comments).

4.2 Tribal Consultation

The United States Government has a trust responsibility to federally recognized tribes that has been consistently recognized in the federal court system. The primary focus of the Forest Service's trust responsibility lies in the protection of treaty rights and interests that tribes have reserved on off-reservation lands. In carrying out its responsibilities, the Forest Service must assess proposed actions to determine impacts to treaty rights, treaty resources, or other tribal interests. Where potential impacts exist, the Forest Service has a legal obligation to consult with affected tribes and explicitly address those impacts in planning documents and final decisions.

There are no recognized tribes with treaty rights in New Hampshire. To our knowledge the proposed activities of this project do not impact

treaty rights, treaty resources or other tribal interests.

5.0 ISSUES

The following are the significant issues considered in the analysis and decision (EA, §1.8 Issues Used To Formulate Alternatives).

Cumulative Effect of Creating Additional Early-Successional Habitat (Regeneration Age-Class) (Public)

The forest has already been extensively cut along the Tripoli Road, and timber harvesting proposed in the Tripoli East Project aimed at producing 4 million board feet represents approximately one fifth of the total annual harvest of the White Mountain National Forest. This concentration of timber harvesting, designed to create early-successional habitat, added to the early-successional habitat already created in the Tripoli area, will have negative effects on those species requiring mature and over-mature habitat.

Meeting Habitat Management Unit Desired Composition as Directed By the Forest plan (agency)

Forest Plan direction is to provide a balanced mix of habitats for all wildlife species and to increase wildlife habitat diversity for the full range of wildlife species with emphasis on early-successional species. (See p. III-13 in the Forest Plan for the desired composition of HMUs). In the Tripoli East project area, the present mixture of age classes and forest types is not providing a balanced mix of wildlife habitats, especially early-successional habitat. Vegetative management needs to occur that will create a mix of habitats that more closely meet Forest Plan direction.

Timber Management Activities Adjacent to the East Pond and Little East Pond trails (public)

Logging adjacent to the East Pond and Little East Pond Trails and the Tripoli Road will negatively impact the recreation experience of users who enjoy viewing large trees and a naturally appearing forest.

No Clearcutting (Public)

Clearcutting can negatively impact the aesthetics of the Tripoli project area. Visual impacts of clearcut units may diminish recreational experiences.

6.0 DECISION

I have reviewed the analysis presented in the Tripoli East Vegetation Management Project EA 2.0 for the proposed action and alternatives to that action for the Tripoli East Vegetation Management Project. I have also considered the comments received during Scoping and the appeal of the Tripoli East Decision (based on Tripoli East EA 1.0) and discussed the anticipated effects of implementing this decision with the interdisciplinary team (ID team). I have reviewed technical specialist reports including the biological assessment and evaluation in the project record. As a result, I have decided to implement Alternative 4 (Map, p. 20). (See §6.1 Decision Point 1, below, and §2.3.4 Alternative 4 of the EA, p. 19.)

6.1 Decision Point 1:

Which actions, if any, will be approved (which alternative to implement) that will move the Tripoli East Project Area towards the desired condition per Forest Plan direction and the needs identified for this project?

Alternative 4 is a modification of the proposed action. This alternative was developed after additional fieldwork (EA, §2.3.4 Alternative 4, p. 19). Map 6 (EA, Appendix A) displays Alternative 4. Table 2, following page, lists the activities proposed in Alternative 4.

During project implementation, actual amounts of activities accomplished on the ground (measured in acres or miles) may vary slightly to match actual field conditions. Any changes would be evaluated to ensure that any effects are within the parameters of the effects analyzed in this document and would be documented in the Tripoli East project file.

The transportation system is in place and no road construction or reconstruction is included in this alternative.

Table 2: Activities Proposed in Alternative 4 for the Tripoli East Vegetation Management Project

Activity	Amount
Timber Harvesting:	
Even-Aged Management – Clearcutting (northern hardwood, paper birch)	111 Stand Ac
Uneven-Aged Management -	
Single-Tree Selection (approximately 30% of the stand basal area)	47 Stand Ac
Group Selection (groups range in size from 1/10 to 2 acres in size; ½ acre average and represent approximately 26% of stand acres)	811 Stand Ac
Group/Single-Tree Selection (groups range in size from 1/10 to 2 acres in size; ½ acre average and represent approximately 26% of stand acres; single-tree - approximately 30% of the stand basal area)	118 Stand Ac
Transportation	
Pre-haul Maintenance (Forest Roads 31A, 607, 608, 609, 611, 612, & 613)	4.5 Mi
Recreation	
Create Opportunity to Relocate Dispersed Campsites to Upland Sites	Up to 29 Sites
Remove and Restore Riparian Dispersed Campsites	Approx. 25 Sites

[a] See EA, Table 10: Comparison of Alternatives by Individual Stand Treatments, for a detailed description of individual stand treatments and seasonal logging restrictions.

Alternative 4 meets the purpose and need identified for this project.

1. At the end of the decade, there would be 79 acres of northern hardwood type and 32 acres of paper birch in early successional habitat. This is below the Forest Plan "ideal" desired condition for regenerating habitat in HMUs across the Forest. However, Alternative 4 considered the effects of harvesting adjacent to trails, and there were limited opportunities for regeneration in appropriate even-aged stands within the project area. (See also §9.2 Alternative 2 – Proposed Action, below.) Regenerating decadent paper birch stands at this time would help to maintain the limited diversity of forest types in the HMUs. Alternative 4 provides the best mix of even- and uneven-aged treatments to accomplish the objectives of wildlife habitat diversity and regenerating decadent white birch. It is also sensitive to the impacts of harvesting adjacent to the trails in the project area.
2. Alternative 4 will take advantage of log landings created during timber harvesting to provide opportunities for future relocation of dispersed campsites. Campsites are currently located in the riparian zone along the Tripoli Road. Two identified dispersed campsites in the riparian zone will be relocated to the upland sites, which will be leveled and hardened, and the riparian sites will be closed and rehabilitated. This will alleviate parking problems along the Tripoli Road and will also reduce possible future impacts to the riparian ecosystem.
3. The transportation system within the Tripoli project area is adequate to serve the various short- and long-term access needs of the Tripoli Project Area, including recreation and timber management. Neither construction nor reconstruction of roads is needed. Only 4.5 miles of pre-haul road maintenance will be necessary.
4. Providing hardwood saw timber and wood fiber through sustainable management by harvesting mature stands (even-aged management) or individual trees or groups of trees (uneven-aged management) and replacing the harvested trees with young trees are management goals that were identified for MAs 2.1 and 3.1. Alternative 4 proposes harvesting in 30 stands. This harvesting is projected to generate an estimated 4.5 million board feet of timber (both saw logs and pulp) and to supply various wood products for the public.

Alternative 4 accomplishes Forest Plan direction by following the Management Area direction and Standards and Guidelines for MAs 2.1 and 3.1 (Forest Plan, pp. III-30 to III-41). Alternative 4 provides an appropriate mix of silvicultural treatments to accomplish wildlife habitat improvement objectives in a way that maintains a sustainable supply of wood products. Clearcutting is the optimum method of regenerating mature stands of tree species in the project area (Forest Plan FEIS, pp. IV-30 through IV-40 [§(3), ¶¶1 & 2, pp. 37-38]; Forest Plan,

Appendix M – Vegetation Management Practices – Rationale For Choices). Group and single-tree selection are appropriate methods of harvesting and replacing mature trees. The mix of silvicultural management practices provided by Alternative 4 best utilizes the existing potential of sites and trees to accomplish Forest Plan Objectives utilizing Forest Plan Standards and Guidelines for timber management in MAs 2.1 and 3.1 (Forest Plan, pp. III-32 and III-37-39 respectively).

Alternative 4 responds to the issues raised in scoping (EA, Table 11: Comparison of Alternatives by Responsiveness to Unresolved Issues, pp. 23-24):

1. The amount of regeneration harvesting in the Tripoli Project Area will have no negative cumulative impact on HMUs 416 and 417;

2. The increased amount of regenerating stands in the project area will move HMUs 416 and 417 towards the desired condition for early-successional habitat; 111 acres (same as Alternative 6, 100% more than Alternative 1 [No Action], 21% less than Alternative 2 [Proposed Action], and 15% less than Alternative 5).

3. Effects from uneven-aged management prescribed in Alternative 4 will meet the Forest Plan visual desired condition for MA 3.1. Visual concerns with harvesting along the East Pond trails were addressed by careful placement of group selection units adjacent to the trails. The effects will meet Forest Plan desired conditions for MA 3.1(see §7.0 Rationale For Decision and §9.5 Alternative 6, below). Visual Quality Objectives (VQOs [Forest Plan Standards and Guidelines, III- 11]) will be met in the Tripoli East Project Area under Alternative 4 (EA, Table 11: Comparison of Alternatives By Responsiveness to Issues, (4), p. 16; Table 15C: Comparison of Alternatives By Effects to the Social Environment, p.22).

4. The impacts of clearcutting in the Tripoli Project Area will meet Forest Plan visual goals for the Tripoli Project Area. Minor changes on the landscape resulting from proposed clearcuts will be visible as distant views from Mt. Moosilauke; shapes and patterns of the proposed cuts blend well with existing terrain & vegetation. Visual quality objectives of the Forest Plan will be met. Alternative 4 has the least visual impact while achieving wildlife habitat concerns and harvest volume.

   Alternative 4 produces the most early-successional habitat with less visual effects than Alternative 5. Alternative 5 proposes a 20-acre clearcut that could be visible from the Russell Pond Road Overlook. In Alternative 4 this area would be harvested using group selection. Alternative 6 would have less visual effects than Alternative 4, but would create substantially less early-successional habitat. Alternative 3 has less visual effects in terms of clearcuts, but supplies no early-successional habitat. (See EA, Tables 11 & 12, pp. 15-23.)

   See item #3 above.

6.2 Decision Point 2: FINDING OF NO SIGNIFICANT IMPACT –

Does the proposed project have a significant impact that would trigger a need to prepare an Environmental Impact Statement?

I have reviewed the effects of Alternative 4, taking into account both the context and intensity described in 40 CFR 1508. After thorough consideration of the analysis presented in the Tripoli EA 2.0, Appendices, Forest Plan, and comments received, I have determined that these actions are not a major federal action, individually or cumulatively, and will not significantly affect the quality of the human environment. In a local context, the short and long term site-specific actions of the selected alternative (Alternative 4) are not significant. Therefore, an environmental impact statement is not needed. This determination is based on the following intensity factors:

6.2.1 Consideration of Beneficial and Adverse Effects

Both beneficial and adverse effects of implementing Alternative 4 have been

considered (EA, §2.4 Comparison of Alternatives, pp. 12-23 and Chapter 3 - Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109). Beneficial effects did not influence the finding of no significant impact.

6.2.2 Effects on Public Health and Safety

Public health and safety are not adversely affected by Alternative 2 (EA: §1.2 Purpose of the Proposal, p. 3 and §1.4 Need for the Proposed Project, pp. 3-4; Appendix C – Mitigation Measures; and effectiveness of mitigation measures located throughout Chapter 3 - Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109).

There are mitigation measures in place to minimize possible conflicts between timber harvesting activities and the recreational public in the project area (EA: Table 15B, Recreation, p. 21; §3.1.4.2 [Transportation] Mitigation Measures, p.45-46, §3.1.4.3 [Transportation] Direct and Indirect Effects, pp. 46-47, §3.3.2.2 [Recreation] Mitigation Measures, pp. 99-100, and §3.3.3.3 [Recreation] Direct and Indirect Effects, pp. 100-101); Appendix C - Mitigation Measures, p. C-2-5).

6.2.3 Unique Physical and Biological Characteristics

Although characteristic features such as cultural resources and wetlands are located in the project area, none of the unique characteristics of the geographical area will be significantly affected by the proposed actions (EA, Chapter 3 Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109). No parklands, prime farmland, or wild and scenic rivers are located in the project area.

6.2.4 Controversial

Controversy is described as a dispute amongst the scientific community. Based on that definition, there is no substantial dispute amongst the scientific community as to the size, nature, or effect of the federal action on the various biological and physical environments. Based on the involvement of Forest resource specialists and members of the public (Scoping), the effects of the proposed actions on the quality of the human environment are not highly controversial). All of the effects of the Alternative 4 (EA, Chapter 3 Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109 are within the scope of those considered and analyzed in the Forest Plan FEIS, Chapter IV.

EA Section 3.2.2.6 Effects Determinations for Federal TEPS & State TESSC & Other Wildlife, discloses that the USFWS concurred with the Tripoli East BE/BA effects determinations. Furthermore, New Hampshire state agencies, such as NH Fish and Game Department and NHNHI, did not responded to public scoping with specific concerns for wildlife and vegetation resources (including TEPS) within the Tripoli East Project Area.

EA, Appendix B, §D.2 State of New Hampshire Historic Preservation Office, p., B-5 discloses that,

> "Based on the project review documentation which you have submitted to the Division of Historical Resources and through our discussions pertaining to the protection of identified historic sites, it appears that the undertaking, as proposed, will have 'no adverse effect,' pursuant to 36 CFR Part 800.5, on any properties or districts that are listed in or may be eligible for the National Register, nor properties of known or potential architectural, historical, archaeological or cultural significance, if the work is done as discussed."

6.2.5 Uncertain, Unique, or Unknown Effects on the Quality of the Human Environment

There are no known effects to the human environment that are highly uncertain or involve unique or unknown risks. All of the effects of the Alternative 4 (EA, Chapter 3 Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109) are within the scope of those considered and analyzed in the Forest Plan FEIS, Chapter IV. This timber-harvesting proposal is similar to many other timber management projects that have been conducted on the White Mountain National Forest for which the effects are known through experience, monitoring, records of timber sale inspections, and stand examination.

6.2.6 Possible Precedent for Future Actions

These actions do not establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration. The proposed action incorporates those practices envisioned in the Forest Plan under Management Areas 2.1 and 3.1 direction and within the standards and guidelines of the Forest Plan.

6.2.7 Cumulative Relationship of Actions

These actions do not individually, nor taken cumulatively with other activities within the areas affected, reach a level of significance (EA, Chapter 3 Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 31-88). The EA describes the cumulative effects on soils, water quality and quantity, air quality, vegetation, terrestrial wildlife, aquatic resources, transportation, cultural resources, visual, recreation, economics, community well being, and environmental justice. I am satisfied after review of the EA that none of the cumulative effects of the proposed action are significant. Where appropriate, mitigation measures are proposed that are known to keep activities below the threshold level of significance (EA, Appendix C – Mitigation Measures).

6.2.8 Effects on Significant Scientific, Cultural, or Historical Resources

A heritage resource survey was completed (CRRR# 98-4-2; EA, 3.3.2 Cultural Resources, pp. 97-98). There is no anticipated loss of significant scientific, historic, or cultural resources.

All known sites within the study area will be avoided during layout, marking, and logging operations. Sites will be identified on the sale area map and protected/avoided under the timber sale contract during logging operations.

Units adjacent to known cultural sites would be logged in the winter, under snow and frozen ground conditions to help protect historic values associated with the sites. An implementation-monitoring project would be designed to track certain cultural sites within the project area (see EA, Appendix C)

If, in the course of any project activities, previously unknown sites or artifacts were to be located, activities would stop immediately in that location. The district heritage paraprofessional or Forest archaeologist would be called in to evaluate the finds and make recommendations on how to proceed.

6.2.9 Threat to Endangered Species or Their Habitat Per The Endangered Species Act

The Biological Evaluation/Assessment (BE/BA) determined that federally-listed Threatened, Endangered, Proposed, and Sensitive species (TEPS) or their habitat would not be adversely affected by the actions of this project (see project file). The White Mountain National Forest completed a Forest-wide Biological Assessment (BA) of the potential effects to TEPS from continued implementation of the 1986 Forest Plan, as amended. The US Fish and Wildlife Service (USFWS) subsequently rendered a Biological Opinion (BO) with the Incidental Take Statement (USDI, 2000), which concurred with the White Mountain National Forest BA, that continued implementation of the Forest Plan would cause either a beneficial effect, no effect, and/or not likely to adversely affect the majority of TEPS species for the White Mountain National Forest, and is not likely to jeopardize the continued existence of Canada lynx and Indiana bat. See §§6.4 Decision Point 4 and 10.4 Endangered Species Act (ESA), below.

6.2.10 Threat or Violation of Laws or Requirements that Protect the Environment

Applicable laws were incorporated into the Forest Plan Standards and Guidelines (Forest Plan pages III-5 through III-41), and Alternative 4 complies with the Forest Plan, as amended. In addition, some project mitigation measures have incorporated more recent "best management practices" utilized by state agencies (EA, Appendix C – Mitigation Measures). The actions comply with all Federal, State, and local laws enacted for the protection of the environment. See §10.0 Findings Required By Other Laws And Regulations, below.

6.3 Decision Point 3:

What mitigation measures and monitoring requirements should the Forest Service apply to these activities to meet Forest Plan standards and guidelines for all resources?

The management requirements necessary to meet the intent of current direction, regulation and law include:

- Standards and Guidelines in the Land and Resource Management Plan for the White Mountain National Forest, as amended (Threatened, Endangered, and Sensitive Species, April 4, 2001);
- Canada Lynx Conservation Agreement and Strategy (CLCAS); and
- Terms and Conditions of the Biological Opinion on the Forest-Wide Programmatic BA.

Mitigation measures designed to prevent or reduce possible effects resulting from the implementation of the selected alternative are documented in EA, Appendix C – Mitigation Measures of the Tripoli East Vegetation Management Project EA.

There are three categories of monitoring that would be implemented as part of my decision (EA, Monitoring, p. 119). Two specific programs have been set up as part of the Tripoli Project: butternut monitoring and cultural site monitoring in the Thornton Gore area (EA, Appendix C and Project File).

6.4 Decision Point 4:

Will a Forest Plan amendment be required to accommodate this project?

The activities proposed in the Tripoli East Project and their potential effects are within those anticipated and evaluated in Chapter IV of the Forest Plan FEIS and are consistent with Forest Plan Standards and Guidelines (see **§8.0 Consistency With the Forest Plan**, p. 12). Therefore, no Forest Plan amendment will be required to implement this project.

7.0 RATIONALE FOR DECISION

I have chosen Alternative 4 for the following reasons:

- Alternative 4 is consistent with the agency mission. Through Congressional mandate, National Forest Lands are managed to provide multiple benefits to all Americans in a sustainable way for present and future generations. The original management emphasis was identified as watershed protection (Creative Act, 1891) and a continuous supply of wood products (Organic Act, 1897). Over the years, management for wildlife and fish, outdoor recreation, wilderness, heritage resources, minerals, grazing, wild and scenic rivers, and roads were added to the Forest Service mission. General direction, for how the White Mountain National Forest is to be managed in a sustainable way for multiple benefits is found within the Forest Plan.
- Alternative 4 is responsive to the protection and maintenance of environmental quality, including site productivity, water quality, anadromous fish habitat, TES wildlife and plant species, native plant communities, and management indicator species (MIS). This decision moves the project area toward the desired condition of forest stands that provide a diversity of habitats for a wide range of wildlife species and a sustainable flow of commercial timber; best meets the stated purpose and need; addresses the issues; and provides for environmental protection through project design features, management requirements, and mitigation measures.
- Alternative 4 is responsive to the resolution of the issues identified during scoping and comments received during the 30-day notice and comment period (§1.8 Issues used to Formulate Alternatives, pp. 6-7; Appendix I).
- Alternative 4 does not exclude timber harvesting adjacent to the trails or along the Tripoli Road as requested by some commentors who believe harvesting in these recreation areas would have a negative effect

on visuals. However, Alternative 4 strikes a balance between meeting the purpose and need for the project area of moving toward the Forest Plan desired condition and issues raised by the public.

The perception that timber harvesting in recreation areas has a negative effect is not a universally shared belief. Some people enjoy the visual diversity created following timber harvesting, and the Forest Plan envisioned visual diversity. The use of uneven-aged management adjacent to the trails in this instance, will move the project area towards the desired Forest Plan conditions, and, at the same time, soften the perceived impact of harvesting adjacent to trails.

Of the action alternatives, Alternative 4 is most sensitive to the well-established, often competing, uses of the Tripoli project area (wildlife habitat, timber management, and recreation). Alternative 4 meets the intent of the primary land management prescription emphasis for management areas 2.1 and 3.1:

- Increasing wildlife habitat diversity for the full range of wildlife species with emphasis on early-successional species;
- Maintaining the range of recreational opportunities (both roaded natural and semi-primitive motorized); and
- Providing large volumes of high quality hardwood sawtimber and other timber products through intensive management practices on a sustained yield basis.

See also §9.5 Alternative **6** below.

My selection of Alternative 4 furthers the efforts of the White Mountain National Forest to create early-successional habitat within the Tripoli East Project Area, moves the project area towards Forest Plan desired conditions for HMUs 416 and 417, provides the opportunity to relocate dispersed campsites, maintains an adequate road system to meet various objectives of MAs 2.1 and 3.1, and provides a sustained flow of timber to supply wood products for the public.

Management Area 2.1 and 3.1 lands are intended to provide a resource mix of wildlife habitat diversity, roaded natural and semi primitive recreation opportunities, high quality saw-timber and other wood products through intensive timber management, while maintaining an acceptable level of visual quality. Depending upon the resource mix within a given project area, each of these resources may be emphasized a little differently within the context of the management area direction.

The degree of established recreation use on 2.1 and 3.1 lands across the Forest varies. Some areas where recreation use is minimal can support more intensive timber management than areas where recreation pressure is more intense. In the Tripoli Project Area, timber harvesting and recreation (dispersed camping, hiking, and snowmobiling) are both well-established uses of National Forest land. Therefore, it is important in this area to be sensitive to the blending of all resource goals for these management areas.

I believe that Alternative 4 strikes a balance between the outputs and outcomes envisioned by the Forest Plan for these management areas that often appear to be in conflict. Alternative 4 neither maximizes potential wildlife habitat management, timber products, or impacts to the recreation and visual resources, as does Alternative 5. Neither does Alternative 4 minimize impacts to the recreation and visual resources, wildlife habitat management, and timber products as does Alternative 6. Alternative 4 does strike a balance between increasing wildlife habitat diversity and providing quality hardwood sawtimber and other timber products through timber management, maintaining the recreational opportunities already in place in the project area with minimal interruption, and maintaining the visual quality and diversity of the project area.

During scoping, some of the commentors raised the issue of the negative effects of timber harvesting along the Tripoli Road and the East Pond trails on the visual experience (EA, §1.8.3

Timber Management Activities Adjacent to the East Pond and Little East Pond Trails, p. 7 and Appendix B, §§C.1 and C.3, pp. B-3 – B-4).

The Tripoli Road is within MA 2.1. The desired visual condition along major road corridors in MA 2.1 is that

> "large diameter trees with a variety of bark and foliage characteristics will predominate. These trees will represent both shade tolerant and intolerant species. Numerous views of panoramic and ephemeral landscapes will be provided through moving and stationary vista sites (Forest Plan, p. III-31)."

The East Pond trails are within MA 3.1. The desired visual condition for MA 3.1 is:

> "openings of different sizes interspersed with the stands of trees. These intermixed stands will be of irregular size and shape and distributed so that the overall forest will generally be natural appearing (Forest Plan, p. III-36)."

The placement of groups (decadent white birch, average size ½ acre) selected for harvesting in stands immediately adjacent to the trails used two criteria:

1. The opportunity to replace dying trees with new young trees, and
2. The visual change that would be noticeable by hikers. Only hazard (dying) trees are marked directly adjacent to the trails.

Group (average size ½ acre) and single-tree selection harvesting treatments will occur in the units along the Tripoli Road. The openings created by these harvests comply with the Forest Plan visual standards and guidelines for MAs 2.1 and 3.1.

8.0 CONSISTENCY WITH FOREST PLAN

Management activities are to be consistent with the Forest Plan. The decision to implement Alternative 4 of this assessment is consistent with the White Mountain National Forest Land and Resource Management Plan, as amended, standards, guidelines. (See EA, §2.1 Formulation of Alternatives, col. 1, ¶2, p.9; §2.3.4 Alternative 4, Mitigation Measures, p. 11; and under individual resource analyses in Chapter 3.)

9.0 OTHER ALTERNATIVES CONSIDERED AND WHY THEY WERE NOT SELECTED

In developing the reasonable range of alternatives, the ID team considered alternatives that responded to the purpose and need, and addressed important issues. As required by Federal regulation (40 CFR 1502.14(d)), the ID team also analyzed the No Action alternative (Alternative 1).

The initial project proposal was developed July 18, 1997 to meet the objective of increasing early-successional habitat for a diversity of wildlife species and the need to supply commercial timber and wood products to the public (Forest Plan, pp. III-30 and III-36).

Chapter 2 of the EA (pp. 9-23) discusses the alternatives analyzed in depth. Early in the analysis process, the ID team developed a range of 14 alternatives. The design of these alternatives also considered public and agency comments in addition to the purpose and need for the project. Of these 14 alternatives, eight (8) were considered but eliminated from detailed study (EA, Appendix B, §C. Alternatives Considered But Eliminated From Further Study, pp. B-3 – B-5) and six (6) alternatives were considered in detail (EA, §§2.3 Alternatives Considered in Detail and 2.4 Comparison of Alternatives, pp. 17-29).

9.1 Alternative 1 – No Action

If Alternative 1 were to be selected, no mature stands would be cut and regenerated, no mature trees would be cut and replaced by young trees, and no dispersed campsites would be relocated.

I have not selected this alternative because it does not meet the stated purpose and need for the Tripoli Project of increasing wildlife habitat diversity for a full range of species with an emphasis on early-successional habitat, it does not provide opportunities for relocating

campsites along the Tripoli Road, nor does it supply wood for the public.

9.2 Alternative 2 – Proposed Action

Alternative 2 is the Proposed Action. Additional fieldwork found that stand 116/4 was being used as a wildlife corridor. This stand was prescribed as a 30-acre clearcut in the proposed action presented during Scoping. In alternatives 4-6 the prescription for this stand was changed to group selection. Alternatives 4-6 would maintain the wildlife corridor in stand 116/4, and Alternative 2 would not.

Alternative 2 would have provided the most early-successional habitat for wildlife and the second largest volume of sawtimber and wood. However, Alternative 2 would not have taken advantage of log landings as relocation sites for campsites along the Tripoli Road, nor would it have preserved the wildlife travel corridor in stand 116/4, and for these reasons, I have not selected Alternative 2.

9.3 Alternative 3

Alternative 3 emphasizes uneven-aged management. Stands that qualified for a regeneration harvest under even-aged management in Alternative 2 (Proposed Action) would be harvested using group or single-tree selection.

Alternative 3 would have provided timber, taken advantage of log landings as relocation sites for campsites along the Tripoli Road, and preserved the wildlife travel corridor in stand 116/4. However, Alternative 3 would not have provided early-successional habitat to meet Forest Plan desired conditions for HMUs 416 and 417.

I have not selected this alternative because it does not meet the purpose and need of increasing wildlife habitat diversity for a full range of species with an emphasis on early-successional habitat.

9.4 Alternative 5

Alternative 5 responds to the issue of most closely meeting Forest Plan desired conditions for early-successional habitat in HMUs 416 and 417, maintains stand 116/4 as a wildlife corridor, takes advantage of log landings as relocation sites for campsites along the Tripoli Road, and provides the greatest volume of sawtimber and wood fiber. This was achieved by prescribing a clearcut on 20 acres of stand 117/10. This stand meets all the selection criteria for a final harvest and regeneration (even-aged management).

This stand was thinned in 1981. Since then, desirable, shade-tolerant and intermediately shade-tolerant tree regeneration has developed. This provides an opportunity to change the management objective to uneven-aged management and prescribe single-tree and group selection as in Alternatives 2-4 and 6. Under these conditions, I feel that uneven-aged management will better utilize the site.

Stocking in stands 116/27 and 116/31 currently support a prescription of single-tree and group selection. Most of the area encompassing these stands was thinned in 1981. Stocking has recovered, but there is still growing space available. I feel that these stands will provide a better commercial timber opportunity in the future (Vegetation Report, Project File). For these reasons, I have not selected this alternative

9.5 Alternative 6

Alternative 6 was developed to address the issue of effects of timber management on the East Pond Trails and the Tripoli Road. This alternative defers treatment in stands adjacent to the Tripoli Road and the East Pond Trails (proposed for harvesting in Alternatives 2-5). The placement of groups (decadent white birch, average size ½ acre) adjacent to trails in alternatives 2-5 used two criteria:

1. The opportunity to replace dying trees with new young trees, and

2. The visual change that would be noticeable by hikers. Only hazard (dying) trees are marked directly adjacent to the trails.

I have not chosen Alternative 6, because I believe that the design and placement of groups in Alternative 4 best meet the purpose and need for the project, meets Forest Plan visual desired conditions for MAs 2.1 and 3.1, and addresses concerns for visual quality.

10.0 FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

10.1 National Historical Preservation Act

The White Mountain National Forest works in consultation with the New Hampshire State Historic Preservation Office to design projects that are determined to have no effect upon cultural sites in accordance with 36 CFR 800 and The National Historic Preservation Act of 1966, as amended. A Cultural Resource survey was conducted in the project study area in the fall of 1998 (see EA, §6.2.8 Effects on Significant Scientific, Cultural, or Historical Resources).

On September 13, 2002, the Forest Service received a letter from the Deputy State Historic Preservation Officer concerning the cultural sites in the Tripoli Project area. That letter stated, "Based on the project review documentation which you have submitted to the Division of Historical Resources and through our discussions pertaining to the protection of identified historic sites, it appears that the undertaking, as proposed, will have 'no adverse effect,' pursuant to 36 CFR Part 800.5, on any properties or districts that are listed in or may be eligible for the National Register, nor properties of known or potential architectural, historical, archaeological or cultural significance, if the work is done as discussed."

10.2 Executive Order 11990 (wetlands) and 11988 (floodplains)

This project does not impact any floodplains or wetlands, because undisturbed buffers have been designated to separate treatment units from floodplains or wetland areas. Alternative 4 would be in compliance with both of these orders.

10.3 Executive Order 12898, "Environmental Justice"

Based on demographic information, this area Grafton County does not qualify as an Environmental Justice community (EA, 3.3.7 Environmental Justice, p. 87).

10.4 Endangered Species Act (ESA)

The White Mountain National Forest completed a Forest-wide BA of the potential effects to Threatened, Endangered, Proposed, and Sensitive species (TEPS) from continued implementation of the 1986 Forest Plan as amended (USDA 1999). The USFWS subsequently rendered a Biological Opinion with the Incidental Take Statement (USDI 2000), which concurred with the White Mountain National Forest BA that continued implementation of the Forest Plan would cause either a beneficial effect, no effect, and/or not likely to adversely affect the majority of TEPS species for the White Mountain National Forest, and is not likely to jeopardize the continued existence of Canada lynx and Indiana bat.

The White Mountain National Forest also completed a site-specific BE/BA for the Tripoli East Project Area. The Tripoli East BE/BA determined that all action alternatives would cause **no effect** to the federally-listed threatened bald eagle or Canada lynx, and they meet the Standards and Guidelines outlined in the Canada Lynx Conservation Assessment and Strategy for protecting suitable lynx habitat. The BE/BA determined the all action alternatives **may affect, but are not likely to adversely affect** Federally-listed endangered Indiana bat, and they meet the Terms and Conditions outlined in the BO (USDI 2000). All action alternatives would cause **no impact** to the Federally-listed R9 Sensitive peregrine falcon, and **may impact individuals, but would not likely contribute to a trend towards Federal listing or cause a loss of viability to the population or species** of Federally-listed R9 Sensitive eastern small-footed Myotis, northern bog lemming, wood turtle and eight plant

species. This Tripoli East BE/BA received concurrence from the USFWS on March 14, 2002.

10.5 Clean Water Act

The beneficial uses of water in the streams draining the project area would be maintained during and following project implementation through proper project design, mitigation, and Best Management Practices (BMPs) (EA, Appendix C – Mitigation Measures).

10.6 Clean Air Act

Air Quality will not be affected (EA, §3.1.3 Air Quality, pp. 42-43).

10.7 Migratory Bird Treaty Act

Implementation of Alternative 4 will comply with the 1918 Migratory Bird Treaty Act (MBTA) and the MBTA Executive Order 13186 and MOU. This 1918 MBTA Act was designed to forestall hunting of migratory birds and the sale of their parts and was not meant to regulate timber harvesting. Alternative 4 will create early successional habitat suitable for the majority of songbirds and the proposed winter harvest mitigation measures will avoid affecting Neotropical birds and their habitat during the breeding, nesting, and nestling seasons. Therefore, Alternative 4 will not have a measurable negative effect on Neotropical migratory bird populations (EA, §3.2.2.4 Terrestrial Wildlife Environmental Consequences, pg 68).

10.8 National Environmental Policy Act (NEPA)

This Decision Notice and the Tripoli East EA have been prepared in accordance with the requirements of the National Environmental Policy Act.

10.9 National Forest Management Act (NFMA)

In addition to the consistency findings pertaining to the White Mountain National Forest Land and Resource Management Plan, as amended, this act establishes specific guidelines for prescriptions involving vegetative manipulation in National Forest Management (see Forest Plan, Appendix M, p. VII-M-9). My decision is consistent with these guidelines for management prescriptions that involve vegetative manipulation of tree cover [36 CFR 219.27(b)] as follows:

1. *The prescription should be best suited to the multiple-use goals established for the area with potential environmental, biological, cultural resource, aesthetic, engineering, and economic impacts, as stated in the regional guides and Forest Plans [36 CFR 219.27(b)(1)].* Where even-aged management is prescribed, the prescription is optimal because it regenerates stands that are mature and will supply wood products predicted in the Forest Plan (Forest Plan, **Appendix M**). The prescriptions also protect other resource values and mitigates affects where needed (EA: §3.2.1 Vegetation, pp. 42-46; Appendices C – Mitigation Measures and E – Vegetation Report).
2. *The prescription should assure that lands can be adequately restocked except where permanent openings are created for wildlife habitat improvement, vistas, recreation uses and similar practices [36 CFR 219.27(b)(2)].* The practices prescribed for the Tripoli Project are the same as those that have been successful in restocking WMNF MA 2.1 and 3.1 lands during past management entries (Project File, Forest Monitoring Reports).
3. *The prescription should not be chosen primarily because it would give the greatest dollar return or the greatest output of timber, although these factors shall be considered [36 CRF 219.27(b)(3)].* Alternatives 2 and 5 have higher dollar returns than Alternative 4. Alternative 4 was chosen, however, because it best meets the purpose and need for the project, best responds to the issues, and moves the area towards the Forest Plan desired conditions (EA, §2.4 Comparison of Alternatives, pp. 13-23 and §3.3.4 Community, Environmental Justice, & Economics, pp. 104-109).
4. *The prescription should be chosen after considering potential effects on residual trees and adjacent stands [36 CFR 219.27(b)(4)].* No negative effects are anticipated to residual trees or adjacent stands (EA, §3.2.1 Vegetation, pp. 48-56).

5. *The prescription should avoid permanent impairment of site productivity and ensure conservation of soil and water resources [36 CFR 219.27(b)(5)].* The prescriptions include Forest Plan Standards and Guides, Best Management Practices, and Mitigations Measures designed to prevent the permanent impairment of site productivity and conservation of water resources (EA: §2.1.1 Soils, pp. 25-32 and §3.2.1 Vegetation, pp. 48-56, Appendix C – Mitigation Measures).
6. *The prescription should provide the desired effects on water quantity and quality, wildlife and fish habitat, regeneration of desired tree species, forage production, recreation uses, aesthetic values, and other resource yields [36 CFR 219.27(b)(6)].* The prescriptions meet Forest Plan Standards and Guides, which describes the desired condition (EA: Chapter 3, Affected Environment, Environmental Consequences, and Cumulative Effects, pp. 25-109, Appendix C – Mitigation Measures).
7. *The prescription should be practical in terms of transportation and harvesting requirements and total costs of preparation, logging, and administration {36 CFR 219.27(b)(7)].* The prescriptions use existing road systems that need only pre-haul maintenance for use. Harvesting restrictions are only those needed to protect other resources. Costs of preparation, logging and administration are representative of average conditions in the area. (EA: §3.1.4 Transportation, pp. 43-48, §3.3.4 Community, Environmental Justice, & Economics, pp. 104-109, Appendix C – Mitigation Measures).

11.0 IMPLEMENTATION AND APPEAL RIGHTS

This decision is subject to appeal pursuant to 36 CFR 215.7. An appeal may be filed by those who have commented on or otherwise expressed interest in this specific project before close of the comment period. To appeal this decision, a written Notice of Appeal must be postmarked or received within 45 calendar days after the notice of this decision is published in The Manchester Union Leader newspaper, Manchester, NH. However, if the 45-day filing period ends on a Saturday, Sunday, or federal holiday, then the filing time is extended to the end of the next federal working day.

The Notice of Appeal must be sent to:

USDA Forest Service, Eastern Regional Office
Attn: Appeals Deciding Officer
310 West Wisconsin Avenue
Milwaukee, WI 53203

The Notice of Appeal may alternatively be faxed to: 414-297-3127, Attn: Appeals Deciding Officer, USDA Forest Service, Eastern Regional Office.

Appeals must meet the following content requirements of 36 CFR 215.14:

1. State that the document is an appeal filed pursuant to 36 CFR 215;
2. List the name and address of the appellant and if possible, a telephone number;
3. Identify the decision document by title and subject, date of the decision, and name and title of the Responsible Official;
4. Identify the specific change(s) in the decision that the appellant seeks or portion of the decision to which the appellant objects; and
5. State how the Responsible Official's decision fails to consider comments previously provided, either before or during the comment period specified in 36 CFR 215.6 and, if applicable, how the appellant believes the decision violates law, regulation, or policy.

The environmental assessment project file is available for public review at the Ammonoosuc-Pemigewasset Ranger District, RFD #3, Box 15, Rt. 175, Plymouth, NH 03264.

11.1 Implementation Date

If no appeal is received, implementation of this decision may occur on, but not before, 5 business days from the close of the appeal filing period. If an appeal is received, implementation

may not occur for 15 days following the date of the appeal disposition.

11.2 Responsible Official

John Serfass,
Ammonoosuc-Pemigewasset District Ranger, White Mountain National Forest

11.3 For More Information

For further information on this decision, contact:

Sue Wingate, Project Leader
Ammonoosuc-Pemigewasset
Ranger District
RFD #3, Box 15, Rt. 175
Plymouth NH 03264
603-536-1315
swingate01@fs.fed.us

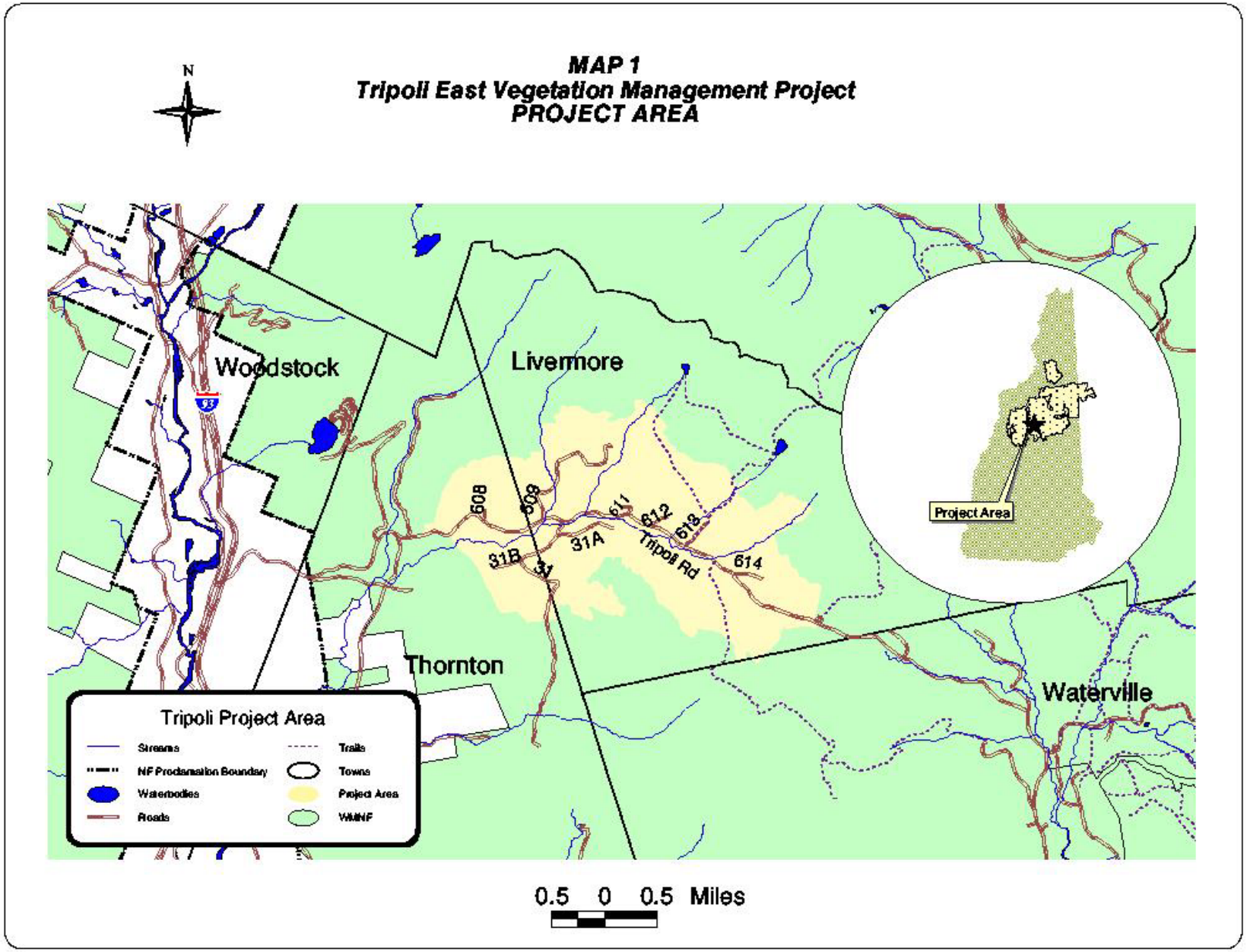
_____

John J. Serfass
District Ranger
Ammonoosuc-Pemigewasset District

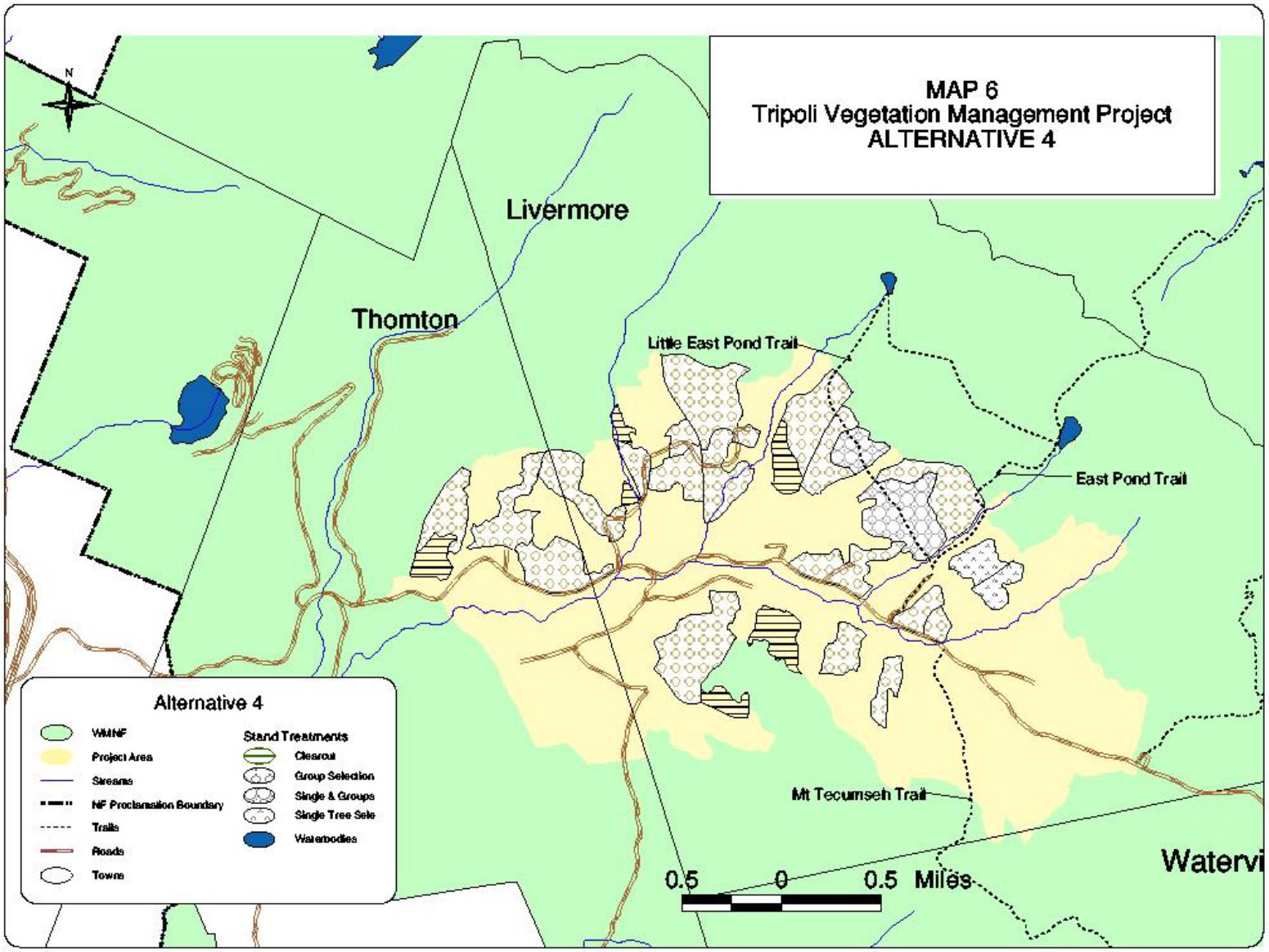
_____

Date

VICINITY MAP



ALTERNATIVE 4 MAP



APPENDIX I – FOREST SERVICE RESPONSE TO 30-DAY COMMENTS

1.0 Introduction

On 09/22/98, a scoping letter was sent out for the Tripoli East Vegetation Management Project. Comments received during scoping for the Tripoli Project were considered during the preparation of the Tripoli EA 2.0. On 03/7/03, the Tripoli Environmental Assessment (EA) was released for 30-day comment. The EA was sent to individuals or organizations that provided comments to the 09/22/98 scoping letter or requested documents.

The following seven (7) respondents submitted comments to the Forest Service during the Tripoli Environmental Assessment Review Process (30-day comment period).

1. Steve Smith, Lincoln NH
2. Hunter Carbee, Program Director, NH Timberland Owners Assn., Concord NH
3. Pierce Beij, Ashland, NH.
4. David Carle, Conservation Action Project, Warner NH
5. Steve Spafford, Hebron NH
6. Joc O'Conor, N. Sandwich
7. Fred Lavigne, Center Sandwich, NH

Appendix I displays:

- Public comments received during the Tripoli East Vegetation Management Project Environmental Assessment review process**,** **Comment**, and
- The Forest Service response, **Response**.

The numbered list below tracks to the **Letter** number shown before comments and indicates which respondent made the comment. Literature cited is taken from the Tripoli EA 2.0 and the BE/BA reference lists:

Appendix I - 30-Day Comments on Tripoli East EA 2.0 and Forest Service Responses

Letter 1

Comment 1:1

I would like to register my strong objection to one aspect of the Tripoli East timber harvest, that being the proposal to harvest along several sections of the East Pond Trail and Little East Pond Trail, including the laying out of skid roads across both trails. I feel that this would cause an unacceptable impact on these trails, which now lead through a primarily undisturbed northern hardwood forest. I have walked these trails many times, have written about them in guidebooks, and have recommended this loop hike to many customers who come into my store, The Mountain Wanderer, in Lincoln. The section along the old railroad grade on Little East Pond Trail, in particular, is one of the loveliest hardwood strolls in this part of the Forest. To line parts of these paths with slash, stumps and skid road crossings would destroy their character. Visitors do not go hiking in the Forest to see slash and stumps. The suggested mitigation measure of moving the slash 50 feet off the trail and "lopping" it to 3 feet high for another 50 feet is not going to preserve the character of the trail.

Response 1:1

Many of the hiking trails on the White Mountain National Forest are in management areas where no timber harvesting is permitted. Other trails are located in MA 2.1 or 3.1 lands where timber harvesting has occurred and is planned for the future. See EA, Appendix H, §A.2 Management Areas, pp. 3-4, for the Forest Plan multiple-use management area direction for these MAs.

Roads that were originally built for the purpose of timber management were included as part of the East Pond Trail.

- The trailhead is located on a former log landing.
- The first part of the trail is located on a former logging road.

- The Little East Pond Trail is located on a former tripolite mining and logging railroad grade.

Forest management activities have taken place near or adjacent to the East Pond and Little East Pond Trails in 1964 and 1984. Because of this history, and the Forest Plan multiple use direction for this area, the Forest Service believes that hiking and forest management have been and, therefore, can continue be compatible activities into the future. See Tripoli Decision Notice: §6.1 Decision Point 1, #4, p.4; §7.0 Rationale For Decision, pp. 10-12; and §9.5 Alternative 6, pp. 13-14.

The harvesting activity close to the trail, as planned, is minimal with mitigations to further reduce visual effects. Stumps and slash will be visible for approximately 3 years of the timber sale, and some hikers will find this objectionable. This will be offset somewhat by the increased diversity in vegetation and wildlife that hikers will experience

There is no visual quality requirement (standard and guide) in the Forest Plan to "*preserve the character of the trail*" in MAs 2.1 and 3.1. This slash disposal mitigation measure was included to reduce visual effects from the trail.

See Response 1:2.

Comment1:2

How can the EA summary state that there would be no adverse effect on recreation?

Response 1:2

This statement should have read "No ***major*** adverse effects are anticipated to air quality, recreation, . . ." See §Tripoli East Vegetation Management Project Ea 2.0 – Errata, p. E/S 1

See §3.3.2.2 Recreation-related Mitigation Measures, §3.3.2.3 Recreation Direct and Indirect Effects, and §3.3.2.4 Recreation Cumulative Effects, pp.99-101, for a discussion of the effects of Alternatives 2-6 on recreation. See §3.3.3.2 Visual-related Mitigation Measures, §3.3.3.3 Visual Direct and Indirect Effects, and §3.3.3.4 Visual Cumulative Effects, pp. 102-104, for a discussion of the effects of Alternatives 2-6 on visuals.

See Response 1:1, above. The mitigation measures are designed to provide joint use of the project area for both timber harvesting and recreation, as envisioned in the Forest Plan, and with as little disruption to each activity as possible. While accommodating both uses of the project area for the duration of a timber sale may be considered an adverse effect on recreation, this is not considered a significant adverse effect. See the Tripoli Decision Notice: §6.1 Decision Point 1, #4, §7.0 Rationale For Decision, pp. 10-12 and §9.5 Alternative 6, pp. 13-14 for further discussion. Forest Plan Standards and Guidelines for recreation in MAs 2.1 and 3.1 (Forest Plan, pp. III-34-35 and III-40-41 respectively) have been followed as well as the Standards and Guidelines for visuals (p. III-35).

The portion of the East Pond and Little East Pond Trails that are within the Tripoli Project Area are in MA 2.1. The recreation objective for this MA is to "Broaden the range of recreation opportunities, mainly those offering roaded natural opportunities (EA, Appendix H, A.2.1)." This MA is in the "Roaded Natural" Recreation Opportunity Spectrum (ROS) class (EA, Glossary, p. 118). Resource utilization practices will be evident.

Activities associated with timber harvesting may have a short-term negative effect on people's recreation experience. However, adjustments in the layout of harvest areas and types of cutting were incorporated to reduce the visual effects to stay within a "Roaded Natural" recreation setting.

Mitigation measures (EA, §3.3.2.**2**, pp. 99-100**,** EA, §3.3.3.2, p. 103, Appendix C) that include limiting harvesting in these alternatives to winter, non-holiday weekdays, and closing trails if cutting, skidding or trucking are occurring adjacent to the trails, would minimize safety risks by avoiding peak recreation use periods. No harvesting is proposed along the trails in Alternative 6.

Comment 1:3

Another adverse impact would be the closing of these trails and the Tripoli Road (for snowmobiling and x-c skiing) during harvest operations. And

would there actually be summer logging operations, with trucks rumbling down the road during that busy time of year? Does not seem like a good mix.

Response 1:3

See Response 1:2 above. There are no designated cross-country ski trails in the Tripoli Project Area, although many people ski in the area. See EA, §3.3.2.2, pp. 99-100 and Appendix **C** for the mitigation measures specific to mitigating effects of proposed actions on recreation in the project area. Timber harvesting is a primary purpose of Management Area 2.1 and 3.1 lands, which comprise the Tripoli Project Area, as is recreation for both roaded natural and semi-primitive motorized ROS classes. The mitigation measures proposed for recreation in this project were designed to allow for joint use of the project area for both timber harvesting and recreation. For public safety, units in the area of the hiking trails are limited to winter harvesting, and mitigation measures further limit harvesting and hauling to non-holiday weekdays by avoiding peak recreation use periods. To minimize conflicts between snowmobilers and harvesting operators, winter hauling on the Tripoli road is limited to non-holiday weekdays (avoidance of peak use periods) and snowmobiling is restricted to holidays and Monday through Friday. The only portions of the project area that can have summer operations are stands along FR 609 (EA, Table 9, p. 13). To minimize conflicts between possible summer and fall harvesting operations and peak summer and fall recreation users, harvesting and hauling will be restricted to non-holiday weekdays, Monday through Thursday. These mitigation measures have been used successfully in the Eastman West Timber Sale, west of the Tripoli Project.

Comment 1:4

I support timber harvesting on the Forest, but recreation is the most important use of the WMNF and I believe it should take precedence where there are potential conflicts. Whatever happened to the concept of buffer zones along trails (and scenic roads, for that matter)? There has been a disturbing trend in recent years of harvesting running roughshod over trails, such as the Smarts Brook cut this winter. Why are harvests planned in places where they impact trails and the visual experience of the hiker?

Response 1:4

See Responses 1:1 - 1:3 above.

The majority of the Forest is currently managed for non-timber objectives, primarily recreation.

Timber harvesting is one of the primary purposes of Management Area 2.1 and 3.1 lands, which comprise the Tripoli Project Area. Recreation, both roaded natural and semi-primitive motorized ROS classes, is also a primary purpose of these MAs. Wildlife habitat management, timber management, and recreation all have a place in these management areas. There are no provisions in the Forest Plan standards and guidelines for these management areas that include buffers around trails and roads. By having multiple-use areas like these, recreational opportunities can be expanded and supply greater absorption for the demand. Relevant law (e.g. MUSY, MFMA) does not provide a mechanism (outside the Forest Plan) for giving "precedence" to one use.

Alternatives 2-6 have been designed to provide different mixes of wildlife habitat management, timber management, and recreation emphasis. Each of these alternatives moves the project area towards the Forest Plan desired condition but to differing degrees. Alternative 5 emphasizes timber management to more closely move the area toward the desired condition than other alternatives. Alternative 6 eliminates any harvesting directly adjacent to trails and roads and moves the project area minimally towards the Forest Plan desired condition as does Alternative 3 (uneven-aged management only). Alternative 1, no action, defers all activities in the project area, would have no impacts to recreation, and would move the project area away from the desired condition.

To eliminate all possible impacts to recreation from timber harvesting in the Tripoli Project area, the management area designations would

need to be changed to a management area that does not allow timber harvesting (something other than MAs 2.1 and 3.1). This would require a Forest Plan amendment and is beyond the scope defined for this project. During Scoping, the public did not suggest changing the management area designation of the Tripoli Project Area.

The Smarts Brook area (not in this project or cumulative effects area) is also in an MA where active timber management can occur. another example of multiple use objectives, where more opportunity for both activities is provided. The Smarts Brook Trail is located on an intermittently used logging road. The road will become inactive soon and turned back into a hiking trail. Harvesting in that area is not anticipated again for another 15 to 20 years.

See Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12 and §9.0 Other Alternatives and Why They Were Not Selected, pp. 12-14.

Comments 1:5

I urge you to delete the part of the Tripoli East harvest that falls within the loop of the Little East Pond Trail and East Pond Trail (i.e. north of Little East Pond Trail and west of East Pond Trail) and any harvesting along the trails, and move the boundaries of harvested areas at least 200 yards downslope (southwest) from the Little East Pond Trail and 200 yards east of the East Pond Trail so that they are not visible to hikers.

Response1:5

See Responses 1:1-1:4; EA, §2.3.6 Alternative 6, p.12, Table 9, p., and Table 15B, p. 21; the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comment 1:6

I also urge you to reduce clearcutting in the harvest as a whole to a bare minimum. There are already many clearcuts visible in the Tripoli area and the cumulative visual effect will only get worse with more clearcuts and checkerboard patch cuts.

Response1:6

See EA, Table 11: Comparison of Alternatives by Responsiveness to Issues, (4), p.15.

Comment 1:7

Please keep the experience of the many hikers who walk these trails in mind when making your decision on Tripoli East.

Response 1:7

We have and will continue to do so.

Letter 2

Comment 2:1

Upon review of the Tripoli East Vegetation Management Project, the New Hampshire Timberland Owners Association recommends the implementation of Alternative 5 and offers the following comments.

Response2:1

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comment 2:2

1. The vegetation management proposals will bring the treated areas of HMU 416 and HMU 417 to the desired conditions of the current forest plan as required by law.

Response 2:2

Comment noted.

Comments 2:3

2. The vegetation management proposals create much needed early successional age class stands, as only 0.70 percent of the lands in these HMUs are in the regenerating age class (Figure 2, p. 54). As 65 percent of the existing community is comprised of mature forest, Alternative 5 best provides a balanced mix of habitats for all wildlife species and increases wildlife habitat diversity for the full range of wildlife species.

Response 2:3

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comments 2:4

3. Silvicultural goals are best targeted in Alternative 5. In particular, group selection is a preferred treatment for compartment 114, stand 30 so that decadent paper birch is properly harvested. Group selection will assist in the regeneration of some pioneer to mid-tolerant hardwood species in these openings, also providing early successional habitat.

Response 2:4

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comment 2:5

4. The additional stands, compartment 116, stands 27 and 31, harvest mature timber and regenerate early successional species. This would help maintain the limited diversity of forest types in these HMUs.

Response 2:5

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comment 2:6

5. The clearcuts in compartment 117, stand 10 and stand 16 best suit the silvicultural and wildlife habitat goals stated in the previous comments.

Response2:6

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comment 2:7

6. The claim that "The close clustering of these smaller canopy openings may give the viewshed a moth-eaten appearance, which is an undesirable visual effect" (Table 15C, p.22) is biased. This should be backed with scientific evidence.

Response 2:7

See: Palmer, James F. 1998. Clearcutting In The White Mountains: Perceptions Of Citizens, Opinion Leaders And U.S. Forest Service Employees. The NY Center for Forestry Research and Development.

Comment 2:8

7. Buffers of at least a tree-length should be left along the Little East Pond trail and the East Pond trail to minimize visual impacts to recreationists.

Response 2:8

The only trees that will be harvested within 50 ft. of the trail are those that show considerable top dieback and are expected to die. These occur as single trees and in groups.

Comment 2:9

Skid trail crossings should be kept narrow and approached at ninety-degree angles where possible and kept clear of slash and debris.

Response 2:9

This mitigation measure is included in project implementation: DN, §6.3.8 Effects on Significant Scientific, Cultural, or Historical Resources, p.?; EA: §3.3.1.2 Cultural Resource-related Mitigation Measures, p. 97; Appendix C – Mitigation Measures, p. C-5.

Comment 2:10

Alternative 5 assists with relocating the 25 camping sites located on the lower terraces of Eastman Brook and its tributaries to prevent future water quality problems.

Response 2:10

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0, Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Comments 2:11

Alternative 5 provides the highest volume of timber, which in turn, will provide the highest economic returns to the local communities, which have a low property tax base. These towns depend on timber taxes and the 25% return to the counties. Total of the timber tax and 25% fund is a projected $307,343. This is significant in as much as the economic returns from recreational use are very limited in that

Response 2:11

Comment noted. See the Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, and §9.0 Other Alternatives Considered and Why They Were Not Selected, pp. 12- 14.

Letter 3

Comment 3:1

I oppose the proposed action because it is inadequate to meet the stated purpose: gives inadequate consideration to Forest management goals

Response 3:1

This comment is not site-specific.

EA, §1.2 Purpose of the Proposal, p.3, states,

> "The purpose of this proposed project is to implement Forest Plan direction (see EA, Appendix H, §A, pp. H-1 – H-5) in the Tripoli East Project Area by addressing site-specific needs and opportunities (§1.3, below) to move the area from the existing condition (EC) towards the desired condition (DC) (see EA, Appendix H, §A.1.4, pp. H-3 – H-5)."

The EA, Appendix H, §A. Forest Plan Direction, pp. 3-6) displays general Forest Plan, Management Area 2.1 and 3.1, and Habitat Management Unit goals that are applicable to the Tripoli Project.

The EA, §1.3 Need for the Proposed Project, pp. 3-4, displays the needs identified for the Tripoli Project Area. Each of the four need statements reference applicable sections of the Forest Plan.

Comment 3:2

I oppose the proposed action ... is inadequate to meet the stated purpose: the needs are not adequately demonstrated

Response 3:2

Need statement #1, pp. 3-4, is concerned with the existing regenerating habitat on MA 2.1 and 3.1 lands within HMUs 416 and 417, within which the Tripoli Project area lies. Additional information on the existing condition and Forest Plan desired condition of regenerating habitat can be found in the EA, Appendix D – Habitat Management Units (HMUs) 416 and 417 Data.

Need statement **#2**, p. 4, describes the existing condition of the dispersed camping sites along Eastman Brook/Tripoli Road in the Tripoli Project area. That statement provides appropriate Forest Plan references concerning recreation goals for MA 2.1 and 3.1 lands. See also EA, Appendix H, §A.2 Management Areas, pp. 3-4.

Need statement #3, p. 4, describes the need to maintain an adequate transportation system in the project area. See Response 3:20.

Need statement #4, see Response 3:22.

Comment 3:3

I oppose the proposed action ... is inadequate to meet the stated purpose: alternatives are not adequately considered

Response 3:3

This commentor does not state why he believes the alternatives are not adequately considered.

The EA, Chapter 2-Alternatives, p. 9, states:

> "The ID team considered 12 alternatives for the Tripoli East Vegetative Management Project. See Appendix B for a discussion of the eight alternatives considered but eliminated from detailed study. Chapter 2 will: 1) describe how those alternatives were formulated, 2) provide a description of the alternatives considered in detail, and 3) present a comparison of the alternatives examined in detail (EA, §2.4 Comparison of Alternatives). This section provides the decision maker with a range of alternatives to consider for the Tripoli East Vegetation Management Project and includes a summary of the analysis of the proposed activities and their anticipated effects."

For each alternative considered in detail, the EA, Chapter 2 details why each alternative was proposed, provides details of the actions proposed, and, for each alternative, compares:

1. Individual stand treatments and season of harvest (EA, Table 9, p. 13);
2. Proposed alternative activities to Forest Plan goals and needs identified for the Tripoli Project (EA, Table 10, p. 14);

3. Proposed activities to the significant issues identified during Scoping (EA, Table 11, p. 15); and

4. Effects of proposed activities on resources (Tables 12A-12C, pp. 16-23).

See EA, Appendix B – Public Involvement, §C. Alternatives Considered But Eliminated From Further Study, pp. B-3 – B-5, for a discussion of alternatives to the Proposed Action that the ID team considered for analysis and the reasons why they were eliminated from detailed study.

In addition, the EA, Chapter 3 – Affected Environment, Environmental Consequences, p. 25, states,

> "Chapter 3 displays the current condition of the resources within the project area and the analysis of direct, indirect and cumulative effects of alternative management activities for the Tripoli East Vegetation Management project." Chapter 3 provided the analysis of the effects of proposed activities in each alternative on different resources, and is summarized in Tables 12A-12C, pp. 16-23."

See Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12 and §9.0 Other Alternatives and Why They Were Not Selected, pp. 12-14.

Comment 3:4

I oppose the proposed action because it is inadequate to meet the stated purpose: cumulative effects are inadequately considered

Response 3:4

Each resource section in the EA, Chapter 3, includes a discussion of cumulative effects: Soils, pp 31- 32; Watershed, pp. 40-41; Air Quality, p. 43; Transportation, pp.47-48; Vegetation, pp.53-54 & 55; Terrestrial Wildlife, 78; Biological Diversity, p. 85; Aquatic Resources, p.96; Cultural Resources, p. 98; Recreation, p.101; Visual Quality, p.103-104; Community, Environmental Justice, & Economics, p. 107-109

Comment 3:5

I oppose the proposed action because it is inadequate to meet the stated purpose: negative effects are not adequately considered and mitigation is inadequate.

Response 3:9

Effects are neither labeled "negative" nor "positive" (unless the data can be quantified), because this would be a subjective rather than objective analysis. For example: one person may believe that a panoramic view provided by timber harvesting is a "positive effect"; another person may believe that any timber harvesting has a "negative" effect on all views of the forest.

While both these opinions are valid, they are subjective and influenced by the different values held by each individual. An objective analysis would be that a specific activity harvested "X acres" and either met or did not meet visual criteria for that specific piece of ground.

The EA, Chapter 2, p. 10, states,

> "In addition to the generally applicable Forest and Management area-wide Standards and Guidelines listed in the Forest Plan in sections III and appendix VIIB, pp. 18-22 see individual resource sections in Chapter 3 and Appendix C – Mitigation Measures for a full list of mitigation measures that would be used in implementing Alternative 2."

In the EA, Chapter 3, each resource section includes a list of mitigation measures specifically designed to reduce possible effects of proposed activities.

See Tripoli Decision Notice, §6.3.1 Consideration of Beneficial and Adverse Effects, p.8.

Comment 3:6

I oppose the proposed action because it is inadequate to meet the stated purpose: some needs are not site specific

Response 3:6

Comment noted. The commentor does not state why he believes the needs are not site specific.

See EA, §1.3 Need For the Project, pp. 3-4 and Response 3:2.

Comment 3:7

I oppose the proposed action because it is inadequate to meet the stated purpose: timing of the action is not adequately considered

Response 3:7

Stands proposed for harvesting in the Tripoli Project Area meet Forest Plan guidelines for maturity. See Tripoli Decision Notice, §9.5 Alt 5, p. 13. Adjacency of recreation units was considered in the design of the project area.

The current demand for both saw timber and round wood is high. FS knowledge was updated by industry comments made at the Black Fly Breakfast, sponsored by the County Extension Service on 4/2/03. Saw timber markets have been strong for some time. Low-grade markets were weak while the pulp mill in Gorham was down. Now it is back in operation and there is a strong demand for that material.

Comment 3:8

The purpose of the proposal (EA p 3) is ". . .to move the area. . .toward the desired condition. . ." Spruce/fir is far below the DC (which itself is far below the natural range of variability). vegetative species composition . . . Will be achieved in two or less rotations" (FP III p 12). But "No treatments proposed in Tripoli would change the habitat community composition. . . "(HB 3.1 pages 15, 16, 17). "Vegetation management will move species composition toward the desired future condition." (FP III p 12) It should be explained why it is justifiable to consider only partial action toward the DC.

Response 3:9

The uneven-aged prescriptions favor increasing spruce/fir compositions. Group selection is applied so that spruce/fir regeneration is released when it is found. (Tripoli Project File, Book 4, §4.4.5 Vegetation Report, Group Selection Prescriptions) Single-tree selection treatments favor shade-tolerant spruce/fir regeneration. In even-aged treatments, spruce/fir individuals or concentrations are often left as reserve trees or patches. Opportunities to favor spruce/fir species are limited because of the current low population and resultant seed source. This will improve with time if spruce/fir is favored during each management entry.

The spruce/fir population would also increase under the No Action Alternative. However, the increase in spruce/fir would increase more slowly under natural succession than through management.

Comment 3:9

The proposed action gives inadequate consideration to Forest Management goals (FP III p 2 & 3) "timber management practices will be implemented to maintain and/or enhance other resource values (FP III p 17); the EA does not assure this, particularly with respect to trails and cultural resources.

Response 3:9

See: EA, §3.3.1 Cultural Resources, pp. 90-98 and §3.3.3Visual Quality, pp. 101-104; Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12, §9.0 Other Alternatives Considered and Why They Were Not Selected, pp. 13-14; and §10.1 National Historic Preservation Act, p. 14; Response to Comment 3:11.

Comment 3:10

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . .protect soil. . ." (loss of calcium is possible)

Response 3:10

The Forest Plan goal is to "protect soil and water resources (Forest Plan, p. III-2)". While goals need to be achieved across the Forest over time, not necessarily everywhere all the time, the Proposed Action (and all alternatives) is still consistent with this goal. It avoids use of whole-tree harvesting and short-rotations (40-year clear-cut interval) on soils shallow to ledge or outwash sands (EA, col.1, ¶3, and col. 2, ¶2, p. 26). In fact, in this case, all alternatives are bole-only harvest. Harvesting is confined to mid- and lower-slope positions where research indicates calcium is most abundant (EA,, col. 1, ¶3, p. 26; EA, Appendix H, p. 9). No published research indicates regional growth decline of hardwood trees due to base cation losses (EA, Appendix H, ¶5, p. 9, see Adams). The health of hardwood forests has not shown

adverse effects from acid deposition (significant source of estimated calcium losses) (EA, Appendix H, ¶5, p. 9, see NAPAR).

Forest measurements at 444 permanent plots since 1934 on a range of base poor soils, where harvesting has occurred, including clearcutting, indicate no change in biomass accumulation (EA, Appendix H, ¶4, p. 9). Review of biomass accumulation studies on hardwood forest following whole-tree and bole-only, clearcut, harvesting in base poor soils near Conway, NH do not indicate any change in biomass accumulation over time (EA, col. 2, ¶3, p. 28, see Fay and Leak). Plot and stand data at Tripoli East Project show no unusual hardwood mortality, one possible indicator of base cation losses (EA, col. 1, ¶1, p. 26, Appendix H, ¶7, p. 9), on soils intensively harvested early in the century (EA, col. 1, ¶2, p. 29, see Goodale). Stocking surveys post clear-cutting on west side of White Mountain National Forest do not indicate any failure at successful regeneration (**Appendix H**, ¶7, p. 9, see Hagan).

No changes in forest composition, another possible indicator of change in soil nutrition, have been measured at the Bartlett Experimental Forest (EA, col. 2, ¶2, p. 28, see Leak and Smith). Examination of 40 plots with 60+ year old northern hardwood forest on a range of rich to poor soil mineralogy (likely calcium richness) did not indicate any unusual tree mortality, including upper, mid and toe-slope positions with calcium demanding sugar maple well represented (EA, Appendix H, ¶7, p. 9, see Fay). See 2001 WM Forest Monitoring Report, especially discussion of hyper-spectral imagery estimates of forest productivity forest-wide. Also note that 1970 Clean Air Act, as amended (1990), is reducing acid anion deposition, which is an important contributor to estimated calcium losses (EA, col. 2, ¶1, p. 29), and that modeling efforts indicate calcium recovery is possible (EA, Appendix H, ¶5, p. 8, see Likens et al).

Comment 3:11

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . . Full recognition of the Forest. . . "

Response 3:11

A visual analysis of the vegetative management treatments proposed in the Tripoli Project was conducted, EA, §**3**.3.3 Visual Quality, p.101–104. Mitigations were developed to deal with the visual effects where recreation activity is likely to occur (EA, §3.3.3.2 Visual-related Mitigation Measures, p. 102). Uneven aged management systems were used wherever activities could be viewed from a recreational facility. Tree marking adjacent to these facilities was limited to dying individuals or groups of trees that are, or would become hazards for those facilities. Single-tree and group selection harvesting mimic natural disturbances. Visual indicators of harvesting, such as cut stumps or lopped and scattered slash, are short term. The proposed treatments in all alternatives meet the Forest Plan visual standards and guides (pp. III-11 & 35).

Alternative 6 was developed in response to the issue of perceived negative impacts to recreation from harvesting adjacent to recreational facilities. It would eliminate all vegetative management activities within view of any recreation facility. See Tripoli Decision Notice, §7.0 Rationale For Decision, pp. 10-12 and §9.5 Alternative 6, pp. 13-14.

Comment 3:12

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . . The importance to society of a natural landscape. . . "

Response3:12

See **Response 3:11.**

Comment 1:13

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . . Including [species] that require old growth habitat. . . "

Response 3:13

The EA 2.0 (EA, §3.2.2 Terrestrial Wildlife Resources and § 3.2.3 Biological Diversity, pp. 60-85) demonstrates that the Proposed Action and alternatives adequately consider the Forest Management Goals (FP III-2-3) to feature management for indigenous wildlife species including those that require old growth habitat. These sections disclose the findings of the BE/BA (Tripoli Project File), which also adequately considered and specifically featured management of threatened and endangered, and sensitive/unique species.

The EA 2.0 (pp. 26, 82, 90 and 101) discloses that the proposed Tripoli East Project Area is located in lower valley bottom to mid-mountain slopes ranging in elevation from 1,300 to 2,450 feet. Page 60 also discloses that FS NHI site-specific field surveys and database reviews found no stands specifically identified as old growth within the Tripoli East Project Area.

Comment 3:14

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . . Demand for consumptive uses of wildlife. . . " (over emphasis on game animals)

Response 3:14

The Terrestrial Wildlife Resources section (EA, §3.2.2) demonstrates that the EA 2.0 considered the WMNF Forest Management Goals (FP III 2 & 3) related to non-consumptive wildlife uses. The Wildlife Section considered the potential direct, indirect, and cumulative effects from all alternatives on wildlife including non-game and TEPS species (non-consumptive). The Recreation section (**§3.3.2**) addresses the existing use of the area such as driving for pleasure and road access and closure, which considers the non-consumptive uses of wildlife such as viewing.

Comment 3:15

The proposed action is inadequate to consideration of Forest Management goals (FP III 2 & 3): ". . . Use timber management as one of the tools . . . "; other "tools" such as "cut and leave" are inadequately considered.

Response 3:15

"Cut and leave" is considered when the need for vegetative treatment is high and product value is low or when there is a risk of damaging other resources from harvesting operations. We did not find these conditions when planning this project (Project File, compartment records).

We did consider "cut and leave" treatments adjacent to homestead foundations. These are susceptible to damage when large trees growing near them blow over and the root wad lifts or dislodges portions or the foundation. An inspection of a sample of sites indicated that most of the trees growing adjacent to foundations are aspen or paper birch. These trees usually die from the top down and or break at the stem rather than tip over. In addition, most of these trees are in a state of decline. This treatment or girdling may be desirable in the future when other tree species present become mature and susceptible to windthrow.

Comment 3:16

The goal to "Involve the public in National Forest Management decisions" is handled well and I appreciate that.

Response3:16

Comment noted.

Comment 3:17

1.3.1 (1) p. 3 & 4 - A "balanced mix of habitats" should provide for some old growth at lower elevations. Natural biodiversity is much lower at the elevations above present MA 2.1 and 3.1 lands where old growth may become available.

Response 3:17

See Response 3:13.

The EA 2.0 (pp. 26, 82, 90 and 101) discloses that the proposed Tripoli East Project Area is located in lower valley bottom to mid-mountain slopes ranging in elevation from 1,300 to 2,450 feet. The EA 2.0, p. 3, and EA, Appendix D also disclose that the existing habitat communities in HMUs 416 and 417 are weighted towards mature and over-mature

forest. Pages 60 and 84 disclose that 10% of the HMUs 416 and 417 would be deferred for development of old-growth characteristics and that no stands specifically identified as old growth were found in the proposed Tripoli East Project Area. The WMNF Forest Plan allows harvesting in MAs 2.1 and 3.1, which do not include sole objectives for reaching old growth status for these MAs.

The EA 2.0 (p. 60) discloses that the Forest Plan Wildlife Strategy ensures that large percentages of forested habitat on the WMNF is distributed in the mature or over-mature age class. Most of the forested habitat on the WMNF is located in areas not subject to harvesting (approximately 400,000 acres) and this habitat is in the mature or over-mature age class. Approximately 50% of forested habitat within managed areas (180,000 acres) is designated to be in the mature or over-mature age class.

Managed and non-managed land is used in the context of where vegetative management can and cannot occur. The Wildlife and Biodiversity sections of the EA 2.0 (EA, §3.2.2 and §3.2.3, pp. 56-85) indicate a greater number of wildlife species that occur on the WMNF use early-successional forest habitat for all or part of their life cycle. Whereas, approximately 10% of the wildlife species occurring in New England use the mature or over-mature age class in their life cycle. The EA 2.0, (EA, §3.2.2 Terrestrial Wildlife Resources and § 3.2.3 Biological Diversity, pp. 60-85) cites recent scientific literature that refers to declining early-successional habitat on the WMNF and in New England at the landscape and regional levels over the past several decades (USDA-FS 1993, WMNF Monitoring Report).

Comment 3:18

1.3.1 (1) p 3 & 4 - Some "decadent or dying trees" should be retained for wildlife purposes. An optimum quantity should be determined and reserved. 1.3.1.(2) p. 4

Response 3:18

Commented noted.

The EA 2.0 (p. 78) discloses that the proposed Tripoli East project would be consistent with the Forest Plan Wildlife Standards & Guidelines and the Terms and Conditions for snag retention outlined in the USFWS Biological Opinion.

Comment 3:19

1.3.1 (2) p 4 -If "there is a need to relocate dispersed campsites . . . " it should be done regardless of this vegetation management - perhaps by the permittee. It is not demonstrated that logging yards are the best sites; certainly some campers would prefer a more natural setting.

Response 3:19

On the Tripoli road, where campers were allowed, in the past, to choose campsites, they routinely chose old log landings, closed road turn outs, or other level, surfaced areas. The only more popular sites chosen were those adjacent to streams, and those are the highest priority for relocation (§**3.3.2 Recreation**, pp. 98-101).

These sites have become compacted and lack vegetative cover. Surfacing is required to extend the use of these sites, and the sites on the lower terraces of Eastman need to be relocated to upland sites (EA, §3.1.1.2 Soil Erosion Affected Environment, p. 27).

By siting relocated dispersed campsites in log landings, land clearing and soil disturbance are kept to a minimum. The sites for the log landings were chosen with the long-term goal of using the cleared area for a dispersed camping site and minimizing the effects of dispersed camping on soil, water and vegetation.

The EA, §3.3.2.3 Recreation Direct and Indirect Effects, Alternative 1 – No Action, p. 100, states,

> "If, in the future, these lower sites adversely affect water quality, they could be closed for resource protection reasons. This could reduce the total number of campsites available to the public in the area. The permittee would continue to harden existing dispersed sites."

If the No Action Alternative were to be chosen for the Tripoli Project, the only action that

could be taken without additional environmental analysis would be to close sites causing resource damage.

An additional environmental analysis would need to be conducted to determine the need to rehabilitate and relocate existing dispersed camping sites within the Tripoli Project area. Based on that analysis, a decision could be made to rehabilitate and relocate sites at risk of causing environmental damage.

Comment 3:20

1.3.1 (3) p 4 - The need for roadwork is largely a result of the project. Otherwise no need is demonstrated.

Response 3:20

The roads support all of the activities currently taking place in MA 2.1 and 3.1 lands in the Tripoli Project Area. This includes sustainable forest management, dispersed camping, hunting, fishing, driving for pleasure, snowmobiling, and access to hiking trails. The only roadwork necessary for the implementation of the project is pre-haul road maintenance. The results will preserve future access for these activities as well as protect other associated resources.

Comment 3:21

1.3.1 (3) p 4 - "Roads may be open to off-road vehicles and/or all terrain vehicle use when they are part of a trail system developed for that use." (FP III p. 23) Unless this condition is met, there is no need to provide roads for that purpose.

Response 3:21

The Tripoli and Hix Mountain roads are currently open to snowmobiling. There are no other plans or proposals to open any of the other roads to off-road or all-terrain vehicles

Comment 3:22

1.3.1 (4) p 4 - I don't think that the need to provide wood is site specific.

Response 3:22

MA 2.1 management direction states,

> "Provide moderate amounts of high-quality sawtimber and other timber products on a sustained yield basis (EA, Appendix H, p. 4; Forest Plan, p. III-30)",

and MA 3.1 states,

> "Provide large volumes of high quality hardwood sawtimber on a sustained yield basis and other timber products through intensive management practices. . . . Grow smaller-diameter trees for fiber production (EA, Appendix H, p. 4; Forest Plan, p. III-36)."

The Tripoli Project area in composed of MA 2.1 and 3.1 lands. Stands proposed for harvesting are mature or over-mature, and treatment of the stands identified for treatment will also meet the wildlife needs identified for the project area and the meet MA 2.1 and 3.1 management direction.

The need is based on the capability of the forested resource. The project planning and analysis looks at the capability of individual stands and the appropriateness of harvesting activities within them. The site-specific need is assigned to stands that are both capable and where the harvest would meet Forest plan standards and guides (Project File, compartment records).

Comment 3:23

There is no doubt that harvesting depletes soil calcium, that this is cumulative, and that the soils have at best only a moderate supply. Loss should be mitigated by strictly limiting harvest to bole only, with slash left well distributed in the woods and in no case buried at the yard. Loss could be further reduced by a "cut and leave" policy for wood of marginal economic value.

Response 3:23

All action alternatives in the Tripoli East Project are bole-only harvest.

Response 3:10 does not indicate a need based on effects to "cut and leave" marginal value wood products. No change in long-term soil and forest productivity is occurring.

Estimated calcium losses have been re-calculated for Tripoli East because recent conversation surfaced that new information is available (Biogeochemistry 41: 89-173, 1998). In short, mineral weathering rates are now

better quantified, which changes estimated losses due to atmospheric deposition over a 120-year period from 11% to 4.2%. Tripoli EA 2.0 Errata Sheet displays the new information. Briefly, this changes the estimated calcium losses with no harvest from 8% (EA at 29) to 5.38% over the cumulative effects analysis timeframe. Bole-only harvest changes from 10% to 8.5% when clear-cutting is applied. Bole-only harvest changes from 9% to 6% when selection harvesting is used. These are all cumulative effects estimates. **This new information does not change the effects displayed in the analysis, just a reduction in the magnitude of the effects.** See Tripoli East Vegetation Management Project Ea 2.0 – Supplemental Information pp. E/S1-2

Comment 3:24

Loss of organic matter is not adequately considered. Organic matter affects nutrition, compaction and soil porosity and should be mitigated by bole only harvests or "cut and leave".

Response 3:24

All action alternatives propose in the Tripoli Project are bole-only harvesting. It is estimated, based on field data in the White Mountains for northern hardwood stands, that for 10-15 years after a bole-only clear-cut the weight of the surface organic matter decreases, then returns back to pre-harvest amounts by about age 60 (Borman and Likens, 1979, Fig. 1.9). Incorporation of organic matter into the upper portions of the mineral soil during the harvesting is reasonably possible, suggesting it is not actually "lost". Also, on a positive note, the warm moist environment created after a clear-cut increases mineralization that supplies nutrients to rapidly growing trees and shrubs that are very site demanding at this stage in their life span. Experts report that measurement of the amount of organic matter is very difficult and subject to error. However, in any event, there is no evidence to show that forest growth is reduced following clear-cutting (see Response 3:23). Uneven-aged harvesting is likely to have even less impact on surface organic matter because only about 20% of a stand is removed from the site. Silvicultural guides for northern hardwoods, where clear-cutting is anticipated, harvest at 60+ year intervals (i.e. thin at 60, final harvest at 120).

Comment 3:25

It is unfortunate that the Forest does not have detailed soil survey; data should probably not be extrapolated from Hubbard Brook Experimental Forest.

Response

Soil surveys do not reveal the availability of soil calcium to support forest productivity. The mineral composition of the soil is more significant given the range of soil textures on mountainside slopes on the Forest. This is why the WMNF has invested significant time and money to foster development of the till source model to depict soil calcium concentrations across the Forest (Fay, 2003). This is also why the Forest Service has examined deep soil pits across a range of mineralogy on the Forest and is completing a data set to characterize the base chemistry of all these sites (Fay, 2003). Ultimately, Forest-wide maps of mineral-weathering rates will be devised to allow use of various biogeochemistry models to improve understanding of those sites where calcium depletion may, in fact, be more of an issue. The Forest does have soil surveys in the base poorest southeast corner of the Forest. See ELT Maps located on the District.

Hubbard Brook Experimental Forest is the source of our depletion calculations, because it is the best, long-term data, which can portray the magnitude of impact that might be expected by alternative harvesting methods. Therefore, it provides a reasonable basis for comparison among alternatives. However, you will notice that we are mindful of the current information about till mineralogy (EA, col. 1, ¶3, p. 28, Appendix H, ¶4, p. 9), and that we rely on regional, forest, and site-specific monitoring information to analyze effects. You might be interested to know that the range of exchangeable calcium in upper B-horizons is essentially as wide at Hubbard Brook Experimental Forest as Forest-wide (Fay, 2003),

so the comparison in terms of magnitude and alternatives may not be unreasonable.

Comment 3:26

Compaction is probably underestimated (Table 16, p 39) as skidders wander.

Response 3:26

Skidding is controlled in several ways. During layout, sensitive locations are identified and excluded from the harvest unit or skidding is prohibited in the contract and the area is shown on the contract map. The operator is not allowed to skid outside of the harvesting unit without obtaining approval from the sale administrator. Prior to releasing a harvesting unit, the operator is required to meet with the sale administrator. At that time, all pertinent restrictions are reviewed. The operator must receive approval from the sale administrator for the location of any areas with repeated skidder use. All other uses are on a one-time basis. With skid trails approved in advance, there is no incentive for the operator to wander around.

Also, the majority of timber harvesting will occur during winter when the ground is snow-covered and/or frozen. Compaction is rarely a problem under these conditions.

Comment 3:27

Wildlife "use" managed lands with "early-successional" habitat (and they "use "unmanaged forest with only natural disturbance, as they have for ten thousand years). It is not demonstrated that any species in the area would fail to thrive without this project; MIS other than snowshoe hare "did not show a measurable difference between managed and unmanaged areas . . . " (EA p 58) ". . . The No Action alternative in the near term would not adversely affect population trends and viability of WMNF MIS within the forest-wide planning area." (EA p 76)

Response 3:27

The commenter has cited the sentence on page 58 of the EA 2.0 out of context. The previous sentence states that MIS snowshoe hare were found to be more prevalent in areas with vegetation management than without. The sentence the commenter quotes on p. 76 is a determination made for population trends and viability within the context of the forest-wide planning area. The EA 2.0 (pg 76) states the No Action would add to a declining amount of early successional habitat within the Tripoli East Project Area. The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources and §3.2.3 Biological Diversity, pp. 60-85) discloses a decline in the amount of early-successional habitat at the WMNF landscape and at the New England regional levels. The EA 2.0 (p 63) discloses recent analysis of population data from monitoring indicates a declining trend of 5 Neotropical migratory birds on the WMNF dependent on early-successional habitat, and a decline in MIS snowshoe hare. Data suggests an array of well-distributed habitats is needed for a variety of wildlife species. The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources (p. 78) and §2.2.3 Biological Diversity (p. 85) discloses under the No Action a potential negative cumulative effect in the long term due to loss of habitat diversity, namely early successional habitat.

Comment 3:28

EA p 82 - Beta diversity is lowered by absence of old growth at lower elevation.

Response 3:28

See Responses 3:13 and 3:17.

The EA 2.0 (p. 82) discloses that approximately 123,800 acres or 80% of the 155,000 acres of Valley Bottom LTA across all management areas on the WMNF occur in MAs subject to vegetation management. The remaining 20% of these acres of Valley Bottom LTAs are located in MAs not subject to vegetation management and available for development of old growth characteristics.

The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources, p. 56) explains that the forest-wide Habitat Management Unit (HMU) strategy (USDA-LRMP 1986a, Appendix B) provides for an array of different forest types (northern hardwood, spruce/fir, paper birch, etc) with objectives of creating different age classes within the various forest types for all of the species that inhabit the WMNF.

One of the age classes defined in the HMU strategy is the regenerating age class (0-9 years old). A variety of wildlife species use habitats that are in the regenerating age class for all or part of their life cycle (DeGraaf et al. 1992).

However, the MIS chestnut-sided warbler occurs in early-successional habitats such as those created through clearcutting treatments. The EA 2.0 (Appendix – D Habitat Management Units (HMUs) 416 and 417 Data) documented that site-specific level analysis of HMUs 416 & 417 shows that the amount of early-successional habitat within the Tripoli East Project Area (in MAs 2.1 and 3.1 lands of HMUs 416 & 417), and across the WMNF as a whole, is well below the desired level in the ideal HMU described in the 1986 WMNF LRMP. The action alternatives are structured to meet the Purpose and Need of the proposed Tripoli East Project and moving the project area towards the desired conditions for HMUs 416 and 417.

The Forest has only achieved about 50% of its desired goal for regeneration or young age classes of forested habitat and has far exceeded its goal for over-mature habitat (USDA, 1997).

Comment 3:29

"Neutral effects arise when an action affects some species positively and yet affects others negatively . . . " I would not consider it "neutral" if the species affected negatively were scarce and the species affected positively were common.

Response3:29

This sentence quoted is out of context. The sentence in the EA, §3.2.3 Biological Diversity, p. 82 is a general example and was not intended to apply to TEPS species. The EA, §3.2.2.6 Effects Determinations for Federal TEPS & State TESSC & Other Wildlife, pp. 78-80, discloses the direct, indirect, and cumulative effects determinations from the Tripoli East BE/BA (Tripoli Project File) for TEPS species.

Comment 3:30

EA p 82-82 list excellent goals, including "Maintain or Mimic Natural Processes and Naturally Occurring Structural Diversity; The proposed Action and all alternatives would not interrupt the natural processes . . . " The forests are now outside the natural range of variability and harvesting would keep the area from reaching old growth status, which obviously had adequate "early-successional" habitat due to wind throw and other natural disturbance. Therefore I think you would suppress a natural process and that would be an adverse cumulative effect.

Response 3:30

The commenter quoted the EA 2.0 sentence (p. 84) out of context. The sentence states,

> "The Proposed Action and all alternatives would not interrupt the natural processes (i.e. windthrow, ice storm, drought, disease, etc.) characteristic of the region. The Forest Plan Wildlife Standards and Guidelines and the USFWS BO Terms and Conditions for Indiana bat would maintain naturally occurring snag structural diversity."

These natural processes would continue to occur in the area independent of vegetation management.

The WMNF Forest Plan allows harvesting in MAs 2.1 and 3.1, which do not include sole objectives for reaching old growth status for these MAs. The EA 2.0 (p. 60) discloses that 10% of the HMUs 416 and 417 would be deferred for development of old growth characteristics.

The EA 2.0 (pp. 82-83) incorporates the key principles of biodiversity into the analysis within the context of Forest Plan MA objectives. The EA 2.0 (p. 60) discloses that the natural process of forest succession would occur for the development of old growth characteristics within 10% of the HMUs, and page 78 discloses that No Action would add an adverse cumulative effect to the steadily declining trend in early-successional age class at the Tripoli East Project Area and New England regional scales.

Comment 3:31

"Project layout would ensure avoidance of known cultural sites with the exception of the Little East Pond Trail." Judging by past action, cumulative damage to cultural sites is likely.

Response 3:31

Cumulative damage to cultural sites has not occurred in the past when sites have been avoided and protected by the mitigations used in this project. There is a much greater risk of cumulative damage to cultural sites from frost heaving and trees growing through cellar hole foundations or being blown over next to these sites than from timber harvesting. In both cases foundations stones are dislodged and lose the organized quality that made them identifiable as a foundation (Project File).

Comment 3:32

FP III 18 "Timber management prescriptions adjacent to trail corridors will be modified to protect trail and recreation related values. For example, this may include uncut buffers. . . " Has the use of uncut buffers been adequately considered? How much loss of timber value would this

Response

See Response 1:1.

Buffering the effects of logging adjacent to the trail was considered in detail. The treatment boundary in stand 114/9 was moved away form the East Pond Trail. Group cuts in 113/13 and 114/7 were to be located away form the Little East Pond Trail (Project File, treatment maps).

During field review and layout, decadence in paper birch was noted. This often occurred in individuals or groups of trees along the trail. Many of these trees have died recently or are anticipated to die in the near future (Project File). It seemed prudent to harvest these trees during this entry and reduce the need to clear them as part of trail maintenance later.

There will be some short-term visual disturbance, but, in the long run, young healthy trees will replace these decadent trees.

Comment 3:33

This project was not planned "with full recognition of the appearance of the Forest, realizing the importance to society of a natural landscape. . . "

Response 3:33

See Response 3:11.

Comment 3:34

In New Hampshire some private woodlands are deferring harvesting because of the glut of sawlogs and unsatisfactory markets for low-grade wood. This project would be unfair competition for private landowners and make it more difficult for them to practice good forestry. The timing of this project should be reconsidered.

Response 3:34

See Response 3:7.

Comment 3:35

It would be helpful to have more definitions

Response 3:34

We try to include those words that wouldn't be found in a standard dictionary or that have a special definition in context of a document. We will consider including additional scientific or project-specific definitions in future documents

Comment 3:36

It is not clear whether "primary", "secondary association", "use". "basic habitat", necessary" (which is not defined) are intended to imply that something is a site-specific requirement for any species to thrive.

Response 3:36

See Response 3:35.

The EA, Glossary (p. 117) and §3.2.2 Terrestrial Wildlife Resources (p. 59) uses terms from the WMNF Forest Plan MIS framework and language per 36 CFR 219.19 MIS requirements. The EA, §Literature Cited and/or Reviewed, pp. 111-116, demonstrates the FS used extensive relevant and current scientific literature to determine the life history, basic habitat requirements, and habitat use for each MIS, TEPS, and common plant and wildlife species. The entire Terrestrial Wildlife Resources and Aquatic Resources sections (EA, §3.2.2 and §3.2.4, respectively) disclose the basic habitat requirements necessary for any wildlife species (food, cover, water, space). The EA 2.0 (EA, Table 24, pg. 59) discloses that although a species may primarily associate or prefer a habitat community/community type,

literature recognizes that they may use other habitat communities secondarily throughout all or part of their life cycle. The EA 2.0 (p. 61) for example, appropriately uses terms to describe that MIS white-tailed deer require a specific habitat feature such as dense softwood cover necessary for their over-winter survival and use hardwood regeneration areas for browsing.

Letter 4

Comment 4:1

The following comments are submitted on behalf of the American Lands Alliance (ALA), Conservation Action Project (CAP), and Forest Watch-for the proposed Tripoli East Timber sale. These comments are in response to the apparent March 7,2003 draft Tripoli East Vegetation Project EA 2. Our comments are as follows:

Response 4:1

Comment noted.

Comment 4:2

1. The draft Environmental Assessment fails to address issues raised in appeal. After reviewing the March 7, 2003 draft Tripoli East Vegetation Project EA 2 document, we fail to see where the document addresses issues raised in the successful June 12, 2002 appeal of the Finding of No Significant Impact (FONSI) and Decision Notice N) based on the Tripoli East Vegetation, Project Final Environmental Assessment (FEA). For example but not including:

a. Much of the wildlife information in the draft EA2 that the Forest Service appears to rely is hypothetical habitat projections and incomplete information based on information from a component of the "committee of scientists". Nowhere can we find information that comes from the entire committee of scientist as defined in the WMNF Forest plan appeal agreement.

The reliance on data from what the Forest Service is calling the "committee of scientist" is less than reliable or adequate. According to the signed Forest Plan appeal agreement, the Forest Service is required to convene a committee of scientist that has two components: a group of recognized scientists and a group of policy personal defined in the agreement. While it appears that the Forest Service has called some people with science backgrounds together, we have been unable to obtain any records that show that the other component, the policy group, has ever met. Nor can we find any record that the public has been notified of any of the meetings of the "committee of scientist." Therefore, any data the Forest Service is relying on from the "committee" is incomplete. Until such time as the entire committee has developed and interpreted the required information and that information is applied to and published in the draft Tripoli East Vegetation Project EA 2, no decision to progress with the logging is justified.

Response4:2

1. See also Response 4:5.

a. The Wildlife Section (EA, §3.2.2, p. 56) discloses the sources of information the EA 2.0 relied on (but was not limited to) were site-specific and multi-year and multi-seasonal field surveys of the proposed Tripoli East Project Area. The site-specific surveys were conducted by the FS and external cooperating agencies such as Audubon and NHNHI (EA, §Literature Cited and/or Reviewed, pp. 111-116: Audubon, 2003, 1993-1994; Sperduto, 1998; USDA FS, 1991 & 1994, undated, 2000b; additional surveys detailed in Project File). These site-specific surveys are not "hypothetical habitat projections" but are ground-truthed surveys, which are accurate representations of habitat conditions and species occurrence.

The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources, pp. 58, 60, and Appendices D & E) cites relevant and current information on habitat trends at various levels including New England, NH State, and WMNF-wide habitat trend data. Also, the EA 2.0, (§3.2.1 Vegetation, pp. 48, and Appendices D, Tables 1-3, and E), and (EA, §3.2.2 Terrestrial Wildlife Resources, p. 60) demonstrates that the FS completed current analyses of HMUs 416 and 417 for addressing the site-specific vegetation/habitat trends within the proposed Tripoli East Project Area. Furthermore, the entire Terrestrial Wildlife Resources Section EA 2.0 (see also EA, §Literature Cited and/or Reviewed, pp. 111-116) cites extensive current scientific studies and surveys on the habitat

needs of wildlife, including several relevant studies on the WMNF.

The EA 2.0 (p. 57) discloses that as part of an informal settlement of an appeal of the 1986 WMNF Plan, a Committee of Scientist (COS) was formed consisting of recognized wildlife professionals (see Project File for documentation of the COS [policy and technical committee groups] meeting notes and formal recommendation for evaluation monitoring of wildlife strategy of the 1986 Forest Plan). The COS designed peer reviewed statistically valid survey protocols for systematic evaluation monitoring of wildlife responses from implementation of the wildlife strategy as described in the 1986 WMNF Forest Plan. The EA 2.0 (EA, §3.2.2 Terrestrial Wildlife Resources, pp. 57, 58, 61-63, 65-79) refers to wildlife monitoring data gathered by Forest Service personnel per the survey protocols designed by the COS. This monitoring data is used together with additional data in analyzing potential effects within the forest-wide planning area.

The commentor states, "Nowhere can we find information from the entire committee of scientist as defined in the WMNF Forest Plan appeal agreement." The commentor did not request any information regarding any aspect of the COS during either the project Scoping period, the comment period on the Tripoli East EA 1.0, the appeal of the Tripoli EA 1.0 decision, or this review period for the Tripoli East EA 2.0. Information on the COS can be found in the project record.

The FS met their requirements of the informal settlement of the appeal of the 1986 Forest Plan, which is outside of the scope of the proposed Tripoli East Vegetation Management Project.

Comment 4:3

b. There does not appear to be any data in the draft Tripoli East Vegetation Project EA 2 that meets the requirements of federal law pertaining to minimum viable MlS/TES species populations. This issue was raised in and was an apparent significant factor in the successful appeal of the last DN and FONSI for the Tripoli East logging project.

There is no evidence in this new March 7, 2003 draft Tripoli East Vegetation Project EA 2 document that the Forest Service conducted or documentation of a four-season scientifically based, plant or wildlife viability population survey of the project area or any analysis of information obtained from wildlife monitoring in relation to the WMNF logging program that considers actual viability within the WMNF. By omitting this critical information, the Forest Service has violated federal law. Instead of providing the legally required information, the Forest Service appears to rely on, hypothetical habitat projections and incomplete information from a component of the "committee of scientists".

The Forest Service has claimed that because habitat may exist elsewhere within the Forest, management activities would not significantly impact the species' diversity or viability. The Forest Service reached this conclusion without providing any inventory, population, or viability data or analysis of any data gathered from the WMNF, for any of the TES/MIS species. Though these species are, ***by definition, at risk,*** *the Forest Service failed to provide requested baseline population data from which to measure the impact that management activities will have on overall forest populations. Indeed, federal law requires the evaluation of "both amount and quality of habitat and of animal population trends of the management indicator species." (36 C.F.R. § 219. 19(a)(2).)*

Section 36 C.F.R. § 219: 19(a)(6) states that "lp]opulation trends of the management indicator species will be monitored and relationships to habitat changes determined." It is implicit that population data must be collected before it can be monitored and its relationships determined. Likewise, 36 C.F.R. § 219.26 requires that inventories of quantitative data be used when evaluating the effect of management alternatives on forest diversity. Before inventories can be evaluated, they have to be collected.

TES species could be highly vulnerable to the effects of management activities, including the Tripoli East vegetation project; Section § 219.19 requires that the Forest Service monitor their relationship to habitat changes. Section § 219.26 requires the Forest Service to use quantitative inventory data to assess the Forest Plan's effects on diversity. If §219.19 mandates that TES/MIS serve as the means through which to measure the Forest Plan's

impact on diversity and §219.26 dictates that quantitative data be used to measure the Plan's impact on diversity, then, taken together , the two regulations require the Forest Service to gather quantitative data on TES/MIS and use it to measure the impact of habitat changes such as those proposed in the Tripoli East logging project EA2 on the Forest's diversity."(See Sierra Club et al. v. Martin et al.) Until the Forest Service publishes a document that includes the required information as defined above, there is no way the public is able to adequately evaluate the project.

Response 4:3

b. The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources, p. 56) discloses that the EA is consistent with the requirements of the 36 CFR 219.19. Specifically, page 56 discloses the FS, Audubon, and NHNHI conducted multi-year, multi-seasonal, site-specific, current and scientifically valid field surveys to determine existing condition of wildlife habitat and species occurrence within the Tripoli East Project Area, as well as habitat trends and population trends and viability of MIS within the forest-wide planning area. Also, Table 24, p. 59, shows the population trends and viability of WMNF MIS within the forest-wide planning area. Furthermore, the EA, Table 27, pp. 73-75, shows the amount and quality of habitat available to MIS potentially affected by each alternative within the Tripoli East Project Area.

The Tripoli East EA 2.0 (entire §3.2.2 Terrestrial Wildlife Resources and §Literature Cited and /or Reviewed, pp. 111-116) cites relevant and recent research studies conducted on the WMNF. These sections include many of the general references that the commenter requested we include in our analysis. Some of the commentor's references are not site-specific to the Tripoli East Project Area or applicable to the WMNF as a whole. The EA 2.0 Terrestrial Wildlife Resources Section also cites yearly WMNF monitoring reports that include results from scientifically-based, multi-seasonal, forest-wide, and site-specific surveys of plant and wildlife species and their habitats within and adjacent to the Tripoli East Project Area. These Tripoli East EA sections fully disclose up-to-date data on known plant and wildlife populations and their locations in relationship to the Tripoli East Project Area. They also disclose results from several years of population monitoring data to justify viability and trend determinations for the NH state- and federally-listed TEPS species and the WMNF MIS.

The EA 2.0 (Table 27, pp. 73-75) discloses detailed analysis of the No Action and action alternatives on the amount and quality of habitat for the WMNF MIS per 36 CFR 219.19, and for TEPS plants and wildlife per the Endangered Species Act (pp. 78-80). The EA 2.0 cites (Table 24, p. 59) the recent evaluation of wildlife monitoring and population viability assessment of WMNF MIS in the forest-wide planning area (USDA-FS 2001a). The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources) incorporates the forest-wide monitoring information and includes a detailed analysis of potential effects on wildlife and their habitat in general, including TEPS and MIS. The EA 2.0 (pp. 65 and 66) discloses the potential direct and indirect adverse effects of No Action not creating the early-successional habitat used by a variety of wildlife species on the White Mountain National Forest

The Tripoli East EA 2.0 (§3.2.2 Terrestrial Wildlife Resources, p. 56) is in compliance with the 36 CFR 219 for maintaining viable populations of existing native and desired non-native vertebrae species. Per 36 CFR 219.19, the EA, §3.2.2 Terrestrial Wildlife Resources, p. 56, used the MIS framework for analyzing potential effects on the amount and quality of habitat within the project area with an overall determination on potential effects to MIS within the forest-wide planning area as a whole. We have population data gathered in accord with the monitoring protocols for the 15 MIS with potential to occur in the project area. We have analyzed this data and disclosed the effect of this project on forest-wide viability and MIS population trends (EA, Table 24, p. 59 and Table 27, pp.73-75, and Table 29, p. 77). The commentor's note about TES/MIS species being, by definition, at risk, is not correct. MIS species are not required to be "at risk".

The 36 C.F.R. 219.26 is written in the context of the forest-wide planning area intended for Forest Plan level planning purposes. The Tripoli East EA 2.0 (Table 24, p. 59) and the Tripoli East Project BE/BA (Project File) contain quantitative data on the amount of acres of suitable wildlife habitat and disclose detailed evaluations of diversity of plant and animal communities.

The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources) discloses that the FS used relevant forest-wide monitoring reports, including wildlife monitoring in relation to vegetation management. The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources, p. 57) discloses that the FS forest-wide wildlife monitoring data is based on peer reviewed, scientific and statistically valid survey protocols.

The EA 2.0 (§3.2.1 Vegetation, p. 48, and §3.2.2 Terrestrial Wildlife Resources, p. 58, 60) discloses that the FS used current information on forest-wide habitat trends and current analysis of HMU 416 and 417 habitat trends, which include the site-specific Tripoli East Project Area.

The commenter has taken the 36 CFR 2.119.19 requirements out of context as related to the forest-wide planning area. The EA 2.0 (p.56) discloses that the FS met the requirements of the 36 CFR 219.19 and considered the population trends and viability of WMNF MIS within the forest-wide planning area. Furthermore, the EA, Table 24, p. 59) shows the amount and quality of habitat available for each MIS potentially affected by each alternative. The EA 2.0 (§3.2.2 Terrestrial Wildlife Resources) demonstrates that the FS used current sources of site-specific and forest-wide information for WMNF MIS and TEPS species. The EA (pp 78-80) discloses the effects determinations of the Tripoli East BE/BA.

The EA 2.0 (p. 56) discloses that the FS complied with CFR 2.19.19 requirements. Specifically, the EA 2.0 (Table 24, p. 59) displays that the FS adequately evaluated the potential direct, indirect, and cumulative effects of each alternative on the amount and quality of habitat available to WMNF MIS.

Comment 4:4

2. According to this new draft Tripoli East Vegetation Project EA 2 document:

According to the draft Tripoli East Vegetation Project EA 2:

"Because the Forest Plan-only provides direction for vegetation management within management area 2.1 and 3.1 lands, the scope of the Management Area/HMU cumulative effects analysis wi11 be the MA 2.1 and 3.1 lands within HMUs 416 and 417 and includes the adjacent Eastman West Project but does not include any private land" (draft Tripoli East Vegetation Project EA 2 at Appendix H. page 14.)

As any qualified biologist would tell the Forest Service, actions that take place in one area could have significant impacts to many species of both flora and fauna in other areas of the forest. With all due respect, nature more than likely is unaware of the boundaries between MA 2.1, 3.1, and any other MA. We have included-but not limited to-a short list of references related to the analysis of impacts of management activities on various species. In addition, in the past we have submitted numerous other peer-reviewed scientific studies related to this topic. We call of the Forest Service to incorporate this information into the analysis.

To claim that the logging will only impact MA 2.1 and 3.1 areas has no scientific or logical basis. We find it hard to believe that any credible Forest Service biologist would have agreed with a statement such as this. We also find it hard to believe that a committee of scientists would agree that only MA 2.1 and 3.1 lands would have "cumulative effects" from logging, road construction/restoration, and other human-produced impacts. We expect the next draft EA will address this issue appropriately.

Response 4:4

Cumulative effects areas varied by resource: Soil Calcium used the location of the actual harvesting activities, Soil Erosion used the Eastman Brook subwatershed, Vegetation used MA 2.1 and 3.1 lands, etc. See EA, §3.0.2 General Cumulative Effects, p. 25.

The EA, §3.2.1.4 Vegetation Cumulative Effects, p. 53, states,

"The Management Area 2.1 and 3.1 Lands in Habitat Management Units 416 and 417 Cumulative Effects Area (Map 9, see Appendix H, §B3.1 for a description of the area) is used for vegetative cumulative effects analysis through the end of the decade 2012). The Tripoli Project area is part of the 2.1 and 3.1 lands in HMUs 416 and 417. Within the 2.1 and 3.1 lands in HMUs 416 and 417 *there is no private land* (emphasis added).

This area is used because these are the lands that are allocated to vegetative management in the Forest Plan. General direction in the Forest Plan is to try to meet the desired composition for MA 2.1 and 3.1 lands in HMUs. The indirect effect of managing the diversity of habitat communities and age classes is to manage for diversity of wildlife species. Because these are the only areas within the HMUs that can be actively managed for vegetation, this is the area where the effect of meeting the desired composition can be calculated."

This cumulative effects area was used for and provided a discussion of the cumulative effects of the proposed activities on vegetation.

The EA, Appendix H–Forest Plan Direction/Desired Condition and General Background and Resource Information, §B.3.1 Management Area 2.1 and 3.1 Lands in Habitat Management Units 416 and 417 Cumulative Effects Area, pp. 14-19, provides a more detailed description of this cumulative effects area than is in the body of the EA. The Appendix does not state which cumulative effects discussions will use this cumulative effects area for that information you need to refer to each resource discussion of cumulative effects.

The project biologist, Clara Weloth, is currently a Certified Fisheries Professional by The American Fisheries Society and a Certified Wildlife Biologist by The Wildlife Society.

See the EA, §3.2.2.5 Cumulative Effects on Wildlife Resources, p. 78 (§Tripoli East Vegetation Management Project EA 2.0 – Errata, p. E/S1), for an explanation of the areas used for wildlife cumulative effects analysis. The EA 2.0 used multiple cumulative effects areas depending on the home range and habitat needs of the various wildlife species. The EA demonstrates that the FS analyzed the potential effects of vegetation management in and beyond MA 2.1 and 3.1 lands. The Tripoli East EA 2.0 used the broader landscape and regional analysis scales to assess potential cumulative effects to wildlife habitat distribution and connectivity, and wildlife population trends and viability within the forest-wide planning area (36 CFR 2.19.19), such as Physiographic Area 28 for Neotropical migratory birds (p. 78).

The cumulative effects analysis area for Aquatic Resources included the Tripoli Project Area and the larger Eastman Brook subwatershed, which goes beyond MA 2.1 and 3.1 lands (EA, §3.2.3.4 Aquatic Resources Cumulative Effects, p. 96).

Comment 4:5

3. Tripoli East Vegetation Project appeal ALA, CAP, and Forest Watch request that all of the issues raised in the June 12,2002 appeal of the Tripoli East Vegetation Project be adequately addressed in the next iteration of a Tripoli East Vegetation Project EA (3?). In addition, the issues raised in all of the comment letters that have been submitted in the past for this proposed project by the three organizations must be adequately addressed in the next draft EA or, more appropriately in an EIS.

Response 4:5

While CAP did provide comments during Scoping for the Tripoli East Project (Tripoli Project File, Book 3, §3.1.3 Scoping Letters Received), neither ALA nor Forest Watch commented during Scoping. Comments received during Scoping were used to develop issues and alternatives to the Proposed Action (EA, §1.8 Issues Used to Develop Alternatives, pp. 6-7 and Appendix B, §B. Other Issues Brought Forward During Scoping, pp. B-2 - B-3).

CAP appealed the original Tripoli East EA 1.0 Decision. However, ALA and Forest Watch were not listed as appellants (Tripoli Project File, Book 7, Tripoli Appeal, §7.1 6/12/03 CAP Appeal of Tripoli East Vegetation Project). The issues raised by CAP in their appeal of the original Tripoli East EA 1.0 Decision were considered during the analysis of the Tripoli EA 2.0. §1.0 Introduction, p. 1, states,

"The purpose and need for the Tripoli East Vegetation Management Project has not changed. Therefore, no additional Scoping was conducted. The issues identified in the Tripoli EA 1.0 remain the same, and the alternatives to the proposed action remain the same. This Tripoli East EA 2.0 includes a re-analysis of possible direct, indirect, and cumulative effects of the proposed action and alternatives on the various resources found in the Tripoli project area. The comments received during the review period for the Tripoli East EA 1.0 and the comments contained in the Tripoli East Decision appeal were taken into account for the re-analysis of possible direct, indirect, and cumulative effects for this Tripoli East EA 2.0."

See also EA, §1.7.2 Tripoli East Vegetation Management Environmental Assessment 1.0 30-Day Comments and Appeal (6/12/02), p. 6.

Comment 4:6

These are the present issues and concerns of ALA, CAP, and Forest Watch regarding the proposed Tripoli East Timber Sale 2. Thank you for the opportunity to provide our comments.

Response 4:6

Comment noted.

Letter 5

Comment 5:1

After reviewing the Tripoli East Vegetation Management Project EA 2.0, I must comment on my concerns.

Response 5:1

Comment noted.

Comment 5:2

As to 3.3 Socio-Economic Environment (p. 96), 3.3.1 Cultural Resources Affected Environment:

After a hike last fall up Thornton Gore Road. I saw how loggers covered my ancestor's Freewill Baptist Church foundation with dirt. It is obvious that care is not being taken by loggers and the Forest Service to prevent damage to cultural sites.

Response 5:2

We regret that his occurred (during the implementation of the Eastman West Timber Sale, to the west of the Tripoli Project Area) although there was no damage to the site. The site was not on the sale map because it was not in the sale area. It appears that the sale operator pushed some snow off of the road and onto a corner of the foundation. There was some dirt residue in the snow that remained on the foundation stones after the snow melted. We plan to have a crew remove the dirt this summer and place a barrier to prevent this from happening again.

Comment 5:3

My hike continued up across Eastman Brook, past "wildcat Cemetery" (Where my ancestors are interred) to Tripoli Rd. and across to the old Tripoli Rd. to visit my ancestors' foundations. When I approached Peter Merrill's homestead I saw where marking crews had marked trees much too close to avoid damage. I continued up to John Merrill's site to be disappointed yet again!!

Response 5:3

There are marked trees within sight of these foundations. The closest ones are boundary trees. These trees are not to be cut and are used to warn the operator that he cannot operate beyond that point. We moved the line a considerable distance above the Peter Merrill site including the up slope well and the sheep barn foundation. There is a narrow corridor marked just east of the John Merrill site. This is to provide a skid way. No artifacts or foundations were found in this area.

There are some boundary trees marked near the rear of the barn foundation of the David Merrill site. The treatment type in this area is group selection. Only designated groups of trees may be cut in the unit. The nearest designated groups are a considerable distance from the foundations up hill (to the north) and to the west.

None of the marked trees at any of these locations would effect the foundations if they were harvested.

Harvesting operations are restricted to winter only when there is snow cover and soils are frozen. Equipment will be operated on compacted, frozen snow above the surface. Harvesting operations would affect none of the foundations, at any of these sites (EA, Appendix – C; Project File, logging plan).

Comment 5:4

Your 3.3.1.2 Cultural Resource-related Mitigation Measures subsection states: "Project layout would ensure avoidance of known cultural sites …

Response 5:4

See Response 5:3.

Comment 5:5

Your 3.3.1.3 Cultural Resources Direct and Indirect Effects Alternative 1 - No Action ". . . vandalism to sites would be addressed by 'standard forest service cultural resource and law enforcement policy'." This obviously is not being done. The proof I've seen is the fire rings made from foundation stones taken from sites just off Tripoli Rd. on road down to "Wildcat Cemetery".

Response 5:5

See Response 6:6 below.

Our law enforcement people were not aware of this site. There were no proposed treatments near the site so it was not reviewed as part of the project. We are trying to make our employees more aware of sites that need protection.

Comment 5:6

Alternative 2-6 states: "The deputy State Historic Preservation Officer states 'no adverse effect'." But he or she didn't go on site to see what was going to happen to my ancestors' foundations.

Response 5:6

In addition Edna Feighner from SHPO did visit the Tripoli project area with Mary Kruger (Wilderness Society) and Fred Lavigne (Center Sandwich, NH) at Fred's request. The Forest Service was not invited on that field visit. In a phone conversation with Karl Roenke (WMNF archaeologist), Edna stated that she told Mary and Fred that the mitigations measures proposed for the Tripoli Project were appropriate to protect the resource. Subsequently, the Forest Service received a letter of concurrence from Linda Wilson, Deputy State Historic Preservation Officer, stating,

> "For the purpose of compliance with the 'Section 106' historic preservation review procedures of the Federal Advisory Council on Historic Preservation (ACHP), the NH Division of Historical Resources concurs with the proposed finding of 'No Adverse Effect' (8/28/02)." The letter can be found in the Tripoli EA 2.0 Project File. See **EA**, Appendix B, §D.2 State of New Hampshire Historic Preservation Office, p. B-5.

Comment 5:7

Your paragraph "Short-term changes in vegetation may draw the public's attention to certain sites; as the vegetation regenerates site locations would be less visible and less of a temptation to the public." My suggestion is to STAY AWAY from my ancestors' sites so it won't draw attention!!

Response 5:7

Currently, many hikers visit the Merrill farm sites. Many recreationists hike the old town road that passes through the sites. Local historians also conduct tours of the area pointing out remains of the settlement in the Thornton Gore area. This draws more attention to these sites than does timber harvesting.

Letter 6

Comment 6:1

I, along with two other representatives of The Friends of the Sandwich Range, met with you and your Tripoli project team Friday April 4, 2003, to discuss our concerns regarding protection of cultural and historical sites within the proposed Tripoli Sale. This letter covers some of the important agreements and understandings that I feel were reached during our discussion. I would hope that they would be reflected in any revision to the Environmental Assessment.

Response 6:1

Comment noted.

There has been no revision of the Tripoli Vegetation Management EA 2.0.

Comment 6:2

Where we were asking for specific protections (set-backs, skid road maps, reconsideration of tactics and current tree markings), you and your team argued that on-site pre-cut planning with the logger and interactive monitoring during the cut provide a greater potential for protection of cultural/historical sites and artifacts. Consequently, we are very grateful and most encouraged by your strong endorsement of adding "civilian" monitors to this effort. We have several members who would be willing to function in such a role and to work with other team members. Please let us know how and when these people should go about starting that participation.

Response 6:3

Comment noted.

The monitoring effort will begin in the fall prior to winter operations. We will contact the volunteers and work out schedule for selecting and inventorying the sites to be monitored (Project File).

Comment 6:3

We understand that John Williams will have responsibility for the day-to-day oversight of the project, if it is approved. However, we would appreciate the chance to participate in evaluation and possible alterations of cut boundaries in historical/cultural sites.

Response 6:3

Cutting boundaries and skidding plans will be reviewed again this spring. When this effort is complete we will invite the interested parties to review the results. We consider these to be minor adjustments and will not substantially alter the silvicultural objectives or accomplishments.

Comment 6:4

We are also gratified that Karl has agreed to recheck the timber markings in the Clear Brook area. Our concern is to protect the remnants of an early logging camp and artifacts of its gravity-fed water supply from the brook to the site

Response 6:4

Comment Noted. (Steve agreed to do the checking not Karl, Project File)

Comment 6:5

We are also happy that East Pond has been identified for uneven age treatment. This will help maintain the diversity of that area.

Response 6:5

Comment noted.

Comment 6:6

We asked that Campsite #19 (RB Tucker) be closed and rehabbed, and understand that it will be closed this season. We are gratified that Steve intends to retain the road closure leading to the old landing which is adjacent to sites #27 and #28, and that these will be posted as No Camping in 2003. His intention to attempt removal of the soil accidentally pushed onto the foundation of the Freewill Baptist Church is equally welcome.

Response 6:6

The campsite at historic site #19 (RB Trucker) will be closed and rehabbed this spring. "No camping" will be enforced by the concessionaire and Forest Service law enforcement. Foundation stones well be replaced. Road accessing sites 27 and 28 will remain closed to public use. Soil placed on the foundation of the Free Will Baptist church will be removed under the supervision of an archeologist (Project File).

Comment 6:7

As an indication of the care taken regarding protection of cultural sites, team members also mentioned several FS and WMNF documents that we would like to acquire:

Karl cited studies done out west showing that winter harvests over snow pack permit cutting up to and over sites. We'd like to know which studies he refers to and where they can be obtained.

You mentioned specific Standards and Guidelines regarding historical/cultural site protection that say, "When you run across X, then do Y." Could you provide us with the relevant Standards and Guides that will be in use?

Steve mentioned preliminary "skid maps" that WMNF creates, then refines in collaboration with the logger. Could we have copies of these, both the preliminary and any revised ones when they come available?

Steve also mentioned that decisions on the relocation of car-camping sites have been made for 2003, and that the 2004 sites have been identified. Could we have a list of these?

Response 6:7

There are no standards and guides for how to protect specific sites. We do have proven techniques that work under certain conditions. These are applied through knowledge of the site to be protected, type of treatment being applied, soil and slope conditions etc. Skill and experience is required to make these judgments. There are clauses in our timber sale contracts that do specify what actions to take if previously unknown cultural resource sites are encountered.

We have produced some draft maps to asses the feasibility of operations. As we explained the actual skid trail locations are negotiated with the purchaser. Therefore, the draft maps are just that, preliminary. It would be impractical to send new maps until a decision is reached with a purchaser. We are willing to discuss our plans or review progress with interested parties at reasonable points during project implementation.

The sites are not mapped or numbered. It is not possible to produce a plan showing which ones are to be moved. Several sites next to Eastman Brook have been identified as priority sites for relocation.

Sites cannot be relocated to landings proposed in this project until the landing is used and closed. That will depend on the progress of the sale.

Comment 6:8

If any of the understandings mentioned here are not as you remember them, please let me know. I can be reached at 603284-9964 or by mail at pa Box 106, North Sandwich, NH 03259. I thank you for your continuing willingness to give our concerns a full and fair hearing. I look forward to working with you and your team.

Response 6:8

Comment noted.

Letter 7

Comment 7:1

Thanks again for organizing the meeting concerning historic sites in Thornton Gore. You set a high standard for patience and the ability to listen to many points of view on the management of the National Forest

Response 7:1

Comment noted.

Comment 7:2

I'm glad Carl was there to hear what was said. Carl and I have talked a lot about these issues and I'm sure you could tell we don't always agree on how to log around historic sites. I like Carl and respect him for all his knowledge of history and I learn from him every time we talk.

Response 7:2

Comment noted.

Comment 7:3

I still believe in avoidance, when possible, is the best way to preserve the visual, educational, and historic qualities of these sites. There's plenty of opportunity to see the effects of management around sites in the Gore where brushing, girdling trees, logging, landing and road construction, and recreation have taken place. I don't mean to say they are all bad, I just have an opinion that perhaps some of it was unnecessary. I hope we can manage a field visit to see these sites and the proposed logging, as well as the remains of the Gore community.

Response 7:3

Comment noted. Field visit being arranged (Project File).

Comment 7:4

I have read quite a bit of the assessment and can hardly imaging the amount of work that goes into putting it together. I'm sure we all agree that the

land would benefit from all of us having more time out there looking and listening to the actual forested environment. I don't think all of the snowmobile use was well described under the recreation section. The Tripoli Road is not the only area that has snowmobile use.

Response 7:4

The Tripoli and Hix Mountain Roads are the only place where snowmobiling is permitted in the Tripoli project area. These trails are connected to, but not affected by, other trail systems outside of the project area.

§3.3.2.3 Recreation Direct and Indirect Effects, Alternative 2-6, p. 100, discusses the snowmobile use of the Tripoli project area and the effectiveness of mitigation measures to allow joint use of the Tripoli Road for snowmobiling and timber harvesting.

Comment 7:5

In the five to six pages of literature cited or reviewed I didn't see any mention of Justine "Brownie" Gengras's work, anything from Carl Roenke, or anything related to Cultural Resource protection. I never did get to see what the (CRRR #98-4-2) cultural resource survey was about because I have to go to the Laconia office to see it. I'll try to do that soon.

Response7:5

These references weren't used directly in the preparation of the document, but were used in the CRRR report.

CRRR reports are considered sensitive material and are not generally available to the public. They will be available to those participating in the monitoring project.

Comment 7:6

I'm optimistic about the management of historic sites and trails under your and Steve's decision making. I've conveyed these feelings to Brownie who, rightly so, has been discouraged with the past management of the Gore. I hope you can meet with her soon to talk about the public education she did at the campground. I'm glad you brought that idea up and I believe she would be pleased to see that happen again.

Response7:6

Comment noted.

Comment 7:7

Until the next environmental assessment and with great respect to you and your staff.

Response 7:7

Comment noted.

TRIPOLI EAST VEGETATION MANAGEMENT PROJECT EA 2.0 – ERRATA

Page i - §Tripoli East Vegetation Management EA 2.0 - Document Summary**:**

"No adverse effects," should read, "No ***major*** adverse effects"

Page 78 - §Cumulative Effects on Wildlife Resources**,** ¶1**;** This paragraph should have been 2 paragraphs as below.

The home range and habitat needs of wildlife vary by species (DeGraaf et al. 1992). Therefore, the larger MAs 2.1 and 3.1 within HMUs 416 & 417 was used to facilitate evaluation of past, present, and reasonable foreseeable future effects on wildlife resources such as large mammal species with wide home ranges and evaluation of habitat distribution (Appendix H, **B.3.1**). This larger cumulative effects area includes the site-specific Tripoli East Project Area, which contains the smaller home range of smaller mammals, amphibians, and reptiles.

The Tripoli East EA 2.0 also used the broader landscape and regional analysis scales to assess potential cumulative effects to wildlife habitat distribution and connectivity, and wildlife population trends and viability within the forest-wide planning area (36 CFR 219.19):

- Lynx Assessment Units 8 and 11 analyzed in the Tripoli East BE/BA (TES and landscape connectivity).
- The Partners In Flight Physiographic Area 28, included the WMNF (Neotropical migratory birds & hawks).
- The New England and White Mountain subsection regional landscape scales (large and small mammals).

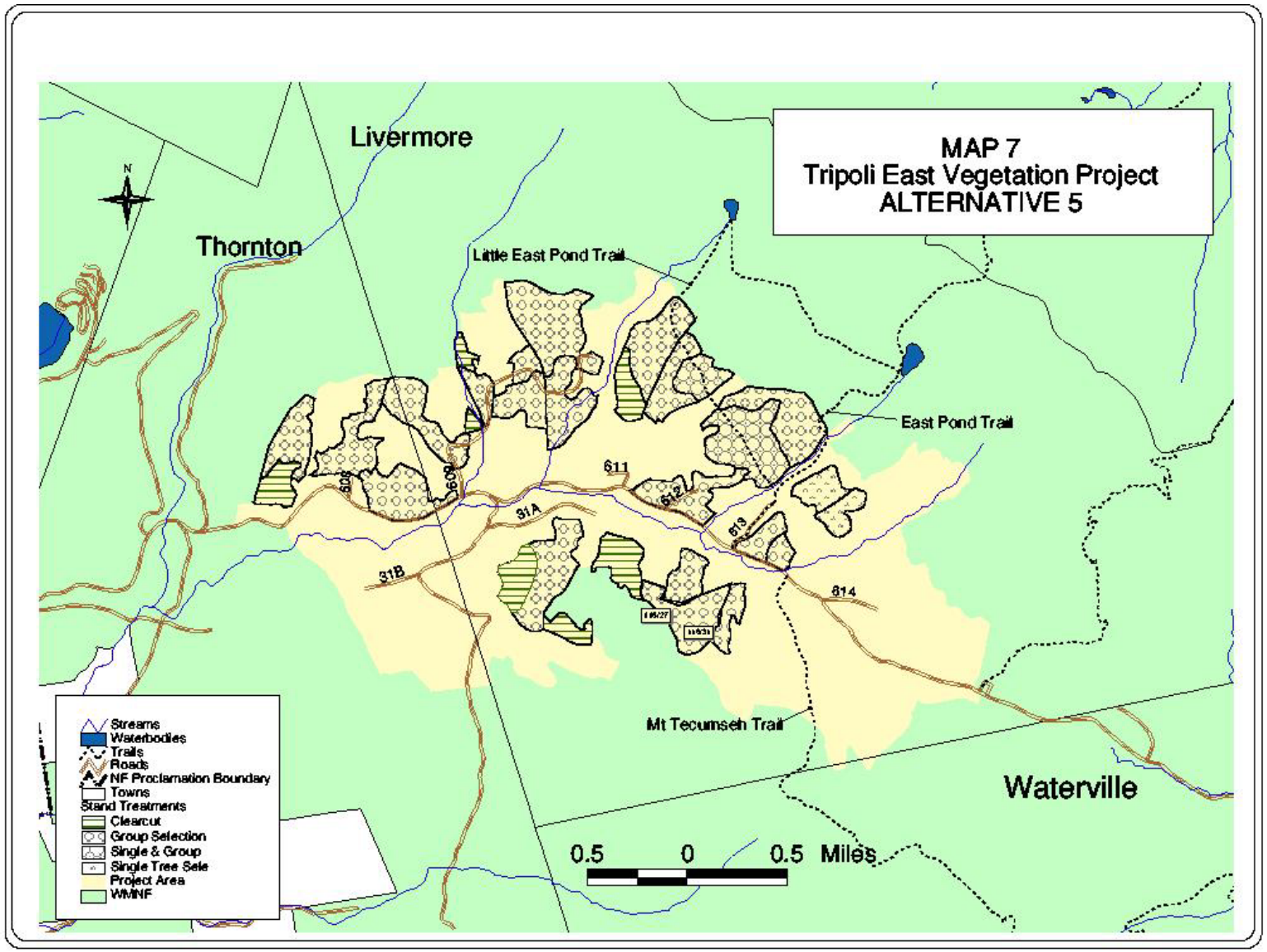
Page 111 - §Literature Cited And/Or Reviewed For The Tripoli East Vegetation Management Project: add the following references.

Palmer, James F. 1998. Clearcutting In The White Mountains: Perceptions Of Citizens, Opinion Leaders And U.S. Forest Service Employees. The NY Center for Forestry Research and Development

Federer, Toni. 1998. The Biogeochemistry of Calcium at Hubbard Brook" (Biogeochemistry 41: 89-173.

Appendix A – Map 7 – Alternative 5: The units south of the Tripoli Road were inadvertently left off the map. This does not affect the analysis in any way. Please see replacement map following.

ALTERNATIVE 5 MAP



TRIPOLI EAST VEGETATION MANAGEMENT PROJECT EA 2.0 – SUPPLEMENTAL INFORMATION

The corrections listed below are based on information received after the Tripoli East Vegetation Management Project EA 2.0 was released for comment and review. They do not change the analysis process or the overall conclusions of effects reached. However, the magnitude of the effects is less than displayed in the Tripoli Vegetation Management EA 2.0 sent for review and comment.

The updated figures appear in parentheses and are bolded: i.e. (**8.5**%)

Page 25, col. 2, ¶5:

> Clearcutting in the beginning of the 20th century (Goodale 1999) plus acidic deposition since the 1950s (Federer et al 1989) in the Tripoli project area are estimated to have led to an **(5.0%)** 8.6% depletion of total Ca^{++} since the early 1900s (Fay, Hornbeck 1992).

Page 28, col. 1, ¶3:

> In the short term, the amount of calcium loss on till soils is estimated to amount to **(3%)** 2% per acre for even-aged management and **(<1%)** 1% per acre for uneven-aged management using conventional harvesting methods for northern hardwoods stands during one entry.

Page 29, col. 1, ¶2:

> For this analysis, historic timber harvest will be considered analogous to conventional clearcutting on primarily northern hardwood sites, and will be assumed to have depleted approximately **(3.2%)** 2%/acre of the total calcium pool on till soils such as these (Fay and Hornbeck, 1993). Based on mass balance studies at Hubbard Brook Experimental Forest (Federer, 1989), acidic deposition also depletes soil calcium. It is estimated that, over a 120-year period, approximately **(4.2%)** 11% of the total soil calcium pool on till soil in northern hardwood forests could be lost due to the impacts of acidic deposition. Acidic deposition has been a measurable human-induced effect since about 1950 (Likens et al 1996), so it is possible that up to **(1.8%)** 5% of total soil calcium has been lost due to acidic deposition during that time. It is reasonable to expect that ten more years of acidic deposition is likely to occur within this cumulative effects analysis period, resulting in another **(<0.3%)** 1% of estimated calcium loss. The total cumulative impact on all northern hardwoods stands, therefore, is estimated as a loss of **(5.3%)** 8% of the total soil calcium currently available, prior to any timber harvest that might take place:
>
> **(3%)**2% (prior land use) + **(1.8%)** 5% (acidic deposition up to 2002) + **(0.3%)**1% (future acidic deposition) = **(5.3%)** 8%

Page 29, col. 2, ¶4:

> The approximate cumulative effect on till soils in northern hardwoods forests can be calculated by adding the potential soil calcium loss resulting from proposed timber harvesting activities **(3%)** (2%/acre for even-aged systems, **(<0.6%)** 1%/acre for uneven-aged systems) to the estimated soil calcium loss resulting from land use history **(3%)** (2%/acre as described above) and past, present and future acidic deposition **(5.3%)** 6%/acre, as described above). The result is a cumulative estimate of **(8.5%)** 10% per acre of soil calcium loss on those acres treated with even-aged management systems (clearcutting), **(5.9%)** 9% per acre on those acres treated with uneven-aged management systems, and **(5.3%)** 8% per acre for those acres receiving no timber harvest treatment.

Page 30, col. 1, Table 14:

Table 14: Acres of Northern Hardwoods with Potential Calcium Loss Resulting from Timber Harvest, Listed by Alternative for Even-Aged and Uneven-Aged Management, Within the Cumulative Effects Area

	Acres with Potential Calcium Loss due to Timber Harvest, by Management System	
Alternative	*Even-Aged Management (clearcutting) – **(8.5%)** 10%*	*Uneven-Aged Management (selection) – **(5.9%)** 9%*
Alternative 2	*141 Ac*	*946 Ac*
Alternative 3	*0 Ac*	*1007 Ac*
Alternative 4	*111 Ac*	*858 Ac*
Alternative 5	*131 Ac*	*880 Ac*
Alternative 6	*111 Ac*	*554 Ac*